

March 2022

# **Mastercard**

## **Binding Corporate Rules**

**External Version**

## **Mastercard Binding Corporate Rules External Version**

### **Contents**

- I. Mastercard EEA Binding Corporate Rules..... Page 3 – 51
- II. Mastercard UK Binding Corporate Rules..... Page 52 – 101

# **Mastercard EEA Binding Corporate Rules**

**Updated on 15 March 2021**

**External Version**

**Mastercard EEA Binding Corporate Rules  
External Version**

**Contents**

<b>I.</b>	Summary.....	5
<b>II.</b>	Duty To Respect The BCRs .....	7
<b>III.</b>	What Do Our BCRs Cover? .....	7
1.	Geographical Scope .....	7
2.	Material Scope .....	8
<b>IV.</b>	How Do We Protect Personal Information? .....	14
1.	Transparency & Fairness .....	14
2.	Legal Ground For Processing .....	15
3.	Sensitive Data .....	15
4.	Data Quality .....	16
5.	Purpose Limitation.....	17
6.	Rights Of Individuals.....	17
7.	Automated Decision Making .....	18
8.	Data Security.....	18
9.	Onward Transfers .....	20
A.	Onward Transfers To Data Controllers And Data Processors.....	20
B.	Onward Transfers To Sub-Processors .....	21
10.	Accountability.....	22
<b>V.</b>	How Do We Ensure Privacy Compliance?.....	22
1.	The Mastercard Privacy & Data Protection Team .....	23
2.	Senior Executive Oversight .....	23
3.	Data Protection Officer .....	23
4.	Privacy and Information Security Officers .....	24
5.	Training & Awareness .....	24
6.	Control & Audit.....	24
<b>VI.</b>	Liability .....	25
1.	Responsibility Of Mastercard BCR Entities .....	25
2.	Third Party Beneficiary Rights .....	26
3.	Burden Of Proof.....	27
<b>VII.</b>	Updates To The BCRs .....	27
<b>VIII.</b>	How Can You Lodge A Complaint And Enforce The BCRs? .....	28
1.	Internal Complaint Handling .....	28
2.	Redress for Individuals .....	28
3.	Duty of Cooperation .....	29
<b>IX.</b>	How Do We Handle Potential Conflicts Of Law?.....	29
Appendix 1	Mastercard Entities Covered By The BCRs .....	31
Appendix 2	Glossary .....	50

## I. Summary

Mastercard is a technology company in the global payments industry that connects Individuals, financial institutions, merchants, governments, public sector bodies, and businesses worldwide. We facilitate the processing of payment transactions permitting Mastercard cardholders to use their cards and other payment technologies at millions of merchants and allowing Individuals, financial institutions, businesses, public sector bodies and businesses to complete payments among themselves. Our network provides Individuals and businesses with a quick, convenient and secure payment method that is accepted worldwide. Our mission is to make payments safe, simple and smart.

To support that mission Mastercard has established a comprehensive privacy and data protection program. We dedicate significant global resources to ensure compliance with applicable data protection laws and we have embedded privacy and data protection into the design of our products and services.

We take privacy and data protection seriously at Mastercard. We have a dedicated Privacy & Data Protection Team that is led by our Chief Privacy Officer who reports to our General Counsel. Our General Counsel is a member of Mastercard's Management Committee who reports to Mastercard's Chief Executive Officer.

Mastercard conducts the following types of data Processing activities:

- **Payment processing.** As a processor of payment transactions, Mastercard obtains and processes Personal Information about cardholders and other Individuals from customers (e.g., issuing financial institutions (issuers), acquiring financial institutions (acquirers), merchants, public sector bodies, partners (e.g., digital wallets) and other businesses) to facilitate payment transactions;
- **Direct-to-consumer services.** Mastercard collects and processes Personal Information of Individuals (e.g., name, email, telephone number, type of payment card) to provide services and programs directly to them, such as loyalty and rewards programs, digital wallets, cardholder services, marketing programs and promotions;
- **Open Banking services.** Mastercard provides connectivity services between and on behalf of Account Servicing Payment Service Providers ("ASPPs") and Third Party Providers ("TPPs"), as well as fraud prevention and dispute resolution services for Open Banking transactions.
- **Customer management.** Mastercard collects and processes Personal Information of customers, merchants, suppliers and vendors (e.g., business contact information) to contact them, to manage business relationships and to offer support services; and
- **Employee management.** Mastercard collects and processes Personal Information of Employees (e.g., name, salary, benefits, education, work experience), including information about contractors or job applicants. The information is used to manage the employment relationship and job application process.

If you are an Employee, please consult the internal version of Mastercard BCRs, which is available on the company's Intranet. If you are a job applicant or a former employee, our Mastercard BCRs apply to the processing of your Personal Information, and some of the sections applicable to our Employees may also apply to the processing of your Personal Information. These sections are only available in the internal version of our BCRs. We will

provide you with a copy of our internal Mastercard BCRs upon request if you e-mail us at [BindingCorporateRules@mastercard.com](mailto:BindingCorporateRules@mastercard.com).

For our “core” payment processing activities, Mastercard acts as Data Processor on behalf of our financial institutions, merchants, customers and partners. For other activities such as programs offered directly to Individuals or employment-related activities, Mastercard acts as Data Controller. Mastercard has established a comprehensive privacy and data protection program and applies a holistic approach whether we act as Data Processor or Data Controller.

Mastercard is committed to comply with EU Data Protection Law, in particular the GDPR (as amended and replaced from time to time) and the e-Privacy Directive 2002/58/EC (as amended by Directive 2009/136/EC and replaced from time to time), as implemented into applicable national legislation.

Mastercard’s Binding Corporate Rules (“BCRs”) are part of our privacy and data protection program and are aimed at facilitating the transfer of Personal Information to and among Mastercard BCR entities worldwide in compliance with EU Data Protection Law. However, where the applicable legislation, for instance applicable national data protection law, requires a higher level of protection for Personal Information, it will take precedence over the BCRs.

Our BCRs cover data Processing activities where we act either as Data Controller or as Data Processor. Therefore, unless otherwise specified, the rules specified in our BCRs apply to both types of activities. Where applicable, we specify which of the rules apply only to activities for which Mastercard is a Data Controller or a Data Processor.

At Mastercard, Personal Information is:

- Processed fairly and in a transparent manner
- Processed only if Mastercard can rely on a valid legal ground
- Protected with additional safeguards if it is considered to be Sensitive Information
- Adequate, relevant and not excessive, kept accurate and up-to-date
- Processed for specified and compatible purposes, and not retained unnecessarily
- Processed in accordance with Individuals' rights
- Only used for automated processing in compliance with the law
- Processed using operational and technical safeguards
- Only processed by Processors if adequate protections exist

Mastercard Europe SA, Chaussée de Tervuren 198A, 1410 Waterloo, Belgium, is the entity responsible for compliance with the BCRs in Europe. Mastercard Europe SA accepts liability for any breach of the BCRs caused by another Mastercard entity located outside of Europe, including any Data Processor or Sub-Processor used by Mastercard. The Data Protection Authority competent for the supervision of Mastercard Europe SA is the Belgian DPA.

In addition, Mastercard is subject to Banking Regulations and the oversight of the European Central Bank with the National Bank of Belgium acting as the lead overseer. The BCRs requirements are without prejudice to any separation of payment card scheme and processing entities required under Regulation (EU) 2015/751 of the European Parliament and of the

Council of 29 April 2015 on interchange fees for card-based payment transactions, and to Mastercard's obligations under Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market, including national implementing laws, as amended from time to time.

All Mastercard BCR Entities are bound to comply with the BCRs requirements by an Intra-group Agreement. The Privacy & Data Protection Team will ensure compliance with the BCRs under Senior Executive oversight as well as internal and external reviews and audits.

Individuals have the right to lodge a complaint with the Belgian DPA or with the Data Protection Authority of their country of residence if they believe that the BCRs have been breached.

Please refer to Glossary for capitalized terms used in this document.

## II. Duty To Respect The BCRs

The BCRs set the standards that Mastercard satisfies when processing Personal Information about Individuals either as a Data Controller or as a Data Processor.

Mastercard's BCRs are binding on all Mastercard BCRs Entities and on all Mastercard Staff Processing Personal Information as follows:

- The Mastercard BCRs Entities are bound by an Intra-group Agreement to respect the BCRs. The Mastercard BCR Entities that are covered by the BCRs and have signed Mastercard's Intra-group Agreement are listed in **Appendix 1**.
- The Mastercard Staff are bound by the BCRs in two ways. First, the Mastercard Staff are required to sign a binding employment contract, which requires employees to comply with the Code of Conduct, all Mastercard policies, and a duty not to disclose or misuse Personal Information. In addition, the Mastercard Staff is required to sign a declaration that they abide by the Code of Conduct and recertify adherence to the Code of Conduct on an annual basis. Adherence to the Code of Conduct requires adherence to all Mastercard's policies, including Mastercard BCRs.

## III. What Do Our BCRs Cover?

Mastercard's BCRs apply to all Mastercard BCRs Entities that process Personal Information either as Data Controller or as Data Processor. Therefore, unless otherwise specified, the rules of our BCRs apply to both types of Processing activities. Where applicable, we specify which of the rules apply only to activities for which Mastercard is a Data Controller or a Data Processor.

### 1. Geographical Scope

Our BCRs cover all Processing of Personal Information, which is or was subject to EU Data Protection Law, and is conducted by Mastercard BCRs Entities worldwide, including the Processing of Personal Information that is transferred and processed by a Mastercard BCRs Entity outside of Europe and the Processing of Personal Information that was subject to EU Data Protection Law and is onward transferred from a country outside of Europe. Our BCRs apply to all Mastercard BCRs Entities worldwide; a list of countries where Personal Information may be transferred is attached in Appendix 1.

## 2. Material Scope

Our BCRs cover the Processing of Personal Information described in this section.

Mastercard receives most of its data when it processes payment transactions; however, we receive a limited number of Personal Information to process these payment transactions. When we process payment transactions, we typically receive the following Personal Information: the personal account number, the merchant name and location, the date, time and the total amount of the transaction. Except as otherwise indicated in the chart below, we do not receive the cardholder’s name or other contact information. Nor do we receive information about the type of product or service that is purchased.

In addition to our core payment transaction processing activities, we also:

- offer some optional programs. If an Individual decides to participate (i.e., opts-in) in these optional programs, we may collect additional Personal Information such as the Individual’s name and their email address. Individuals are provided with a privacy notice for these optional programs, which describes the type of Personal Information we collect and how we process it. In most situations, Personal Information collected in the context of online marketing programs is collected directly from Individuals. We keep the Personal Information collected in the context of optional programs segregated from Personal Information processed for payment processing, unless otherwise specified in the program-specific privacy notice.
- offer debit payment and cheque processing services. When we process Personal Information for debit payment and cheque processing services, we may process additional Personal Information such as the Individual’s name, information that relates to the financial institutions (e.g., sort code), any reference in a free text field, the Individual’s signature, and in limited situations other unique identifiers.
- offer Open Banking services. When we process Personal Information either for ASPSPs and TPPs or at the request of the Payment Services User (“PSU”), we may process additional Personal Information, such as an Individual’s bank account details, the type of Open Banking service requested, and other identifiers. Where we act as a Data Controller, individuals are provided with a privacy notice specific to the Open Banking services.

In more detail, we process the following categories of Personal Information, depending on the type of services provided, whether we act as a Data Controller or a Data Processor, the purpose of the Processing and the categories of Individuals:

Mastercard’s Role	Purposes	Types of Personal Information
<b>Processor</b>	Authorizing, clearing and settling transactions on behalf of our financial institutions, merchants, customers and partners.	Personal Information of <b>cardholders and other Individuals</b> , such as: <ul style="list-style-type: none"> <li>• Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant).</li> <li>• Additional information for debit payment and cheque processing services (e.g., financial institution sort code, account number, free text reference, Individuals’ signature for cheque and other unique identifiers).</li> </ul>



Mastercard's Role	Purposes	Types of Personal Information
<b>Processor</b>	Cross-border and domestic account to account payments on behalf of our financial institutions and corporate customers	<p>Personal Information of <b>account holders, beneficiaries and other Individuals</b>, such as:</p> <ul style="list-style-type: none"> <li>• Data related to fund transfers (e.g., personal account number, associated codes, name and location of the payee).</li> <li>• Contact information (e.g., name, phone number) as well as other information (e.g. date of birth, government ID) when provided by financial institutions and corporate customers.</li> </ul>
<b>Processor</b>	Supporting our customers' issuing and acquiring business.	<p>Personal Information of <b>cardholders</b>, such as:</p> <ul style="list-style-type: none"> <li>• Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant).</li> <li>• Contact information (e.g., name, postal or email address, phone number) as well as other information (e.g. date of birth, gender, government ID) as/when provided by cardholders (for card registration purposes), issuers and acquirers.</li> <li>• Additional information provided by cardholders or merchants (e.g., delivery address, product codes).</li> </ul> <p>Personal Information of staff at <b>financial institutions and merchants</b>, such as:</p> <ul style="list-style-type: none"> <li>• Contact information (e.g., business email address, business postal address, business telephone number, job title).</li> <li>• Where EU Data Protection Law applies to legal entities, Personal Information includes address of merchants, merchant category (e.g., airline) and ID numbers.</li> </ul>
<b>Controller or Processor depending on activity</b>	Cardholder dispute resolution	<p>Personal Information of <b>cardholders and other Individuals</b>, such as:</p> <ul style="list-style-type: none"> <li>• Data necessary for cardholder dispute resolution (e.g., personal account number, cardholder contact information, merchant details, items purchased, information about the dispute, and other unique identifiers for payment and cheque processing services).</li> </ul>
<b>Controller or Processor depending on activity</b>	Connectivity and dispute resolution services as part of our Open Banking solutions	<p>Personal Information of <b>PSUs, TPPs and other Individuals</b>, such as:</p> <ul style="list-style-type: none"> <li>• Account and payment data (i.e. personal account number, date/time/amount of the transaction, name and location of the payee).</li> <li>• Data necessary for Open Banking dispute resolution (e.g. account number, PSU contact information, TPP</li> </ul>

Mastercard's Role	Purposes	Types of Personal Information
		<p>contact information, information about the dispute, and other unique identifiers for Open Banking services).</p> <ul style="list-style-type: none"> <li>• Open Banking request and response information (e.g., payment initiation service requests and responses, account information service requests and responses, request reference number, and response status).</li> <li>• Electronic identification data (e.g. username, password, security questions, IP address).</li> </ul> <p>Personal Information of staff at <b>ASPSPs, TPPs, financial institutions and merchants</b>, such as:</p> <ul style="list-style-type: none"> <li>• Contact information (e.g. business email address, business postal address, business telephone number, job title).</li> <li>• Electronic identification data (e.g. username, password, security questions, IP address).</li> </ul>
<b>Controller</b>	Accounting, auditing and billing.	<p>Personal Information data of <b>staff at financial institutions, merchants, customers and partners</b>, such as:</p> <ul style="list-style-type: none"> <li>• Contact information of persons at financial institutions, merchants, customers and partners (e.g., business email address, business postal address, business telephone number, job title).</li> <li>• Where EU Data Protection Law applies to legal entities, Personal Information includes address of merchants, merchant category (e.g., airline) and ID numbers.</li> </ul>
<b>Controller</b>	Managing customer relationships and financial reporting, including relationships with financial institutions, merchants, customers and partners.	<p>Personal Information of <b>staff at financial institutions, merchants, customers and partners</b>, such as:</p> <ul style="list-style-type: none"> <li>• Contact information of persons at financial institutions, merchants, customers and partners (e.g., business email address, business postal address, business telephone number, job title).</li> <li>• Where EU Data Protection Law applies to legal entities, Personal Information includes address of merchants, merchant category (e.g., airline) and ID numbers.</li> </ul>
<b>Controller</b>	Managing suppliers and vendors.	<p>Personal Information of <b>staff at suppliers and vendors</b>, such as:</p> <ul style="list-style-type: none"> <li>• Contact information of persons at suppliers and vendors (e.g., business email address, business postal address, business telephone number, job title).</li> </ul>
<b>Controller</b>	Marketing activities, including offers, sweepstakes, contests and promotions.	<p>Personal Information of <b>consumers and website users (whether or not cardholders)</b>, such as:</p> <ul style="list-style-type: none"> <li>• Contact information (e.g., name, postal or email address, phone number).</li> </ul>

Mastercard's Role	Purposes	Types of Personal Information
		<ul style="list-style-type: none"> <li>• Electronic identification data (e.g., username, password, security questions, IP address).</li> <li>• Data collected in the context of online marketing programs (e.g., personal characteristics, life habits, consumption habits, interests, geo-location data, and voice and image recordings).</li> </ul>
<b>Controller</b>	Compliance with applicable laws, regulations and law enforcement requests.	Personal Information of <b>Individuals, cardholders and staff at financial institutions, merchants, customers and partners</b> , such as: <ul style="list-style-type: none"> <li>• Data required for legal compliance (e.g., know your customer information for anti-money laundering compliance, responding to Individuals' requests).</li> </ul>
<b>Controller</b>	Employment-related purposes, such as managing Mastercard's workforce, work planning, training and development, talent management, facilitating communication with and between the workforce, managing emergencies (such as ensuring business continuity and protecting health and safety), Human Resources administration (including payroll and compensation management)	Personal Information of <b>Employees and other Mastercard staff</b> , such as: <ul style="list-style-type: none"> <li>• Contact information (e.g., name, address, email address and telephone number, date and place of birth, Social Security number or other national identification number).</li> <li>• Payroll data (e.g., banking details, corporate credit card number and transaction details).</li> <li>• Information on an Individual's position (e.g., current position, title, salary plan, pay grade or level, employee ID).</li> <li>• Talent management information (e.g., application information, resume/CV, previous employment background, education history).</li> <li>• Applicant data (e.g., current and previous employers, job titles, dates of employment, resume/CV information).</li> <li>• Compensation information (e.g., base salary, bonus, benefits, pay enhancements for dependents, performance appraisals).</li> <li>• Internal reports and compliance information (reports on compliance and disciplinary issues within the organization, including gift logs and, where applicable, whistleblowing reports).</li> <li>• Management records (details of any shares of common stock or directorships).</li> </ul>
<b>Controller</b>	Corporate security purposes, such as integration planning and controlling security of premises	<ul style="list-style-type: none"> <li>• System and application data of <b>Employees and other staff</b>, as well as security control data (including any information required to access company systems and applications, information about employees' use of technology resources, and photographs and other</li> </ul>

Mastercard's Role	Purposes	Types of Personal Information
	and logical systems	visual images, such as CCTV images). <ul style="list-style-type: none"> <li>• Visitor data (e.g. registration data, CCTV images).</li> </ul>
<b>Controller or Processor depending on activity</b>	Fraud, authentication, Digital Identity financial crime and risk management.	Personal Information of <b>cardholders and other Individuals</b> , such as: <ul style="list-style-type: none"> <li>• Fraud related payment data (e.g., personal account number, date/time/amount of the transaction, name, merchant's details and location).</li> <li>• Biometric data for authentication purposes (e.g., photographs, voice, fingerprint).</li> <li>• Online fraud and authentication data (e.g., users' device IDs, users' details, merchants' details, browser information, online behaviour, users' interactions with the device).</li> <li>• Financial crime data (e.g., data about money laundering, terrorist financing, bribery, corruption and other unlawful activities).</li> <li>• Location data.</li> <li>• Fraud score, type of fraudulent activity and confirmed fraudulent activity.</li> <li>• Additional information for debit payment and cheque processing services (e.g., financial institution sort code, account number and other unique identifiers, free text reference, Individuals' signature for cheques).</li> <li>• Any other information provided by financial institutions, corporate clients, merchants, customers and partners.</li> </ul>
<b>Controller</b>	Internal research, reporting and analysis	Personal Information of <b>cardholders and other Individuals</b> , such as: <ul style="list-style-type: none"> <li>• Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant).</li> <li>• Any other information provided by financial institutions, corporate clients, merchants, customers and partners.</li> </ul>
<b>Controller or Processor depending on activity</b>	Providing products and services directly to Individuals, including rewards programs, eWallets, and prepaid services.	Personal Information of <b>cardholders</b> , such as: <ul style="list-style-type: none"> <li>• Loyalty and rewards data (e.g., cardholder name, e-mail address, billing or shipping address, phone number, personal account number, transaction data).</li> <li>• e-Wallet registration data (e.g., cardholder name, e-mail address, billing or shipping address, personal account number, card expiration date, card verification code).</li> <li>• Prepaid registration data (e.g., cardholder name, e-mail address, phone number, billing or shipping address, personal account number, card expiration date, and card</li> </ul>

Mastercard's Role	Purposes	Types of Personal Information
		verification code). <ul style="list-style-type: none"> <li>• Biometric data for authentication purposes (e.g., photographs).</li> </ul>
<b>Controller or Processor depending on activity</b>	Providing products and services directly to financial institutions, corporate clients, merchants, customers and partners, including statistical reports and tools, prepaid management services, customer service support.	Personal Information of <b>staff at financial institutions, corporate clients, merchants, customers and partners</b> , such as: <ul style="list-style-type: none"> <li>• Contact information or identifying details of persons at financial institutions, corporate clients, merchants, customers and partners (including but not limited to business or personal email address, business or personal postal address, business or personal telephone number, job title, date of birth, country of origin, social media accounts and information, IP addresses).</li> <li>• Where EU Data Protection Law applies to legal entities, Personal Information includes address of merchants, merchant category (e.g., airline) and ID numbers.</li> </ul> Personal Information of <b>cardholders and other Individuals</b> , such as: <ul style="list-style-type: none"> <li>• Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant).</li> <li>• Data received for cardholder support (e.g., data received at a call centre) or cardholder services (i.e., data to support emergency card replacement services).</li> <li>• Any other information provided by financial institutions, corporate clients, merchants, customers and partners.</li> </ul>
<b>Processor</b>	Providing data analytics products and services to financial institutions, merchants, corporate clients and partners with their instructions.	Personal Information of <b>cardholders and other Individuals</b> , such as: <ul style="list-style-type: none"> <li>• Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant).</li> <li>• Any other information provided by financial institutions, corporate clients, merchants, customers and partners.</li> </ul>
<b>Controller</b>	Anonymising data for the purposes of developing and providing data analytics products and services	Personal Information of <b>cardholders and other Individuals</b> , such as: <ul style="list-style-type: none"> <li>• Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant).</li> <li>• Any other information provided by financial institutions, corporate clients, merchants, customers and partners.</li> </ul>
<b>Controller</b>	Establish, exercise and defend our legal rights, comply with	Personal Information of <b>Individuals, cardholders and staff at financial institutions, merchants, customers and</b>

Mastercard's Role	Purposes	Types of Personal Information
	our legal obligations, industry standards and our policies	<b>partners</b> , such as: <ul style="list-style-type: none"> <li>• Data required to establish, exercise and defend our legal rights, comply with our legal obligations, industry standards and our policies.</li> </ul>

If you are an Employee, please consult the internal version of Mastercard BCRs, which is available on the company's Intranet. If you are a job applicant or a former employee, our Mastercard BCRs apply to the processing of your Personal Information, and some of the sections applicable to our Employees may also apply to the processing of your Personal Information. These sections are only available in the internal version of our BCRs. We will provide you with a copy of our internal Mastercard BCRs upon request if you e-mail us at [BindingCorporateRules@mastercard.com](mailto:BindingCorporateRules@mastercard.com).

#### IV. How Do We Protect Personal Information?

Personal Information is key to Mastercard's business activities. For our business to function we must handle Personal Information with keen sensitivity to privacy and security standards in order to protect Personal Information on behalf of all the members of our global payment network. Our company is committed to the protection of Personal Information and to compliance with relevant laws.

Mastercard first and foremost complies with applicable data protection law. The Mastercard BCRs Entities comply with EU data protection principles both when we act as a Data Controller and where we act as a Data Processor. However, where applicable national data protection law requires a higher level of protection for Personal Information, it will take precedence over the BCRs.

- When we act as a Data Controller, we establish processes and procedures to ensure compliance with all requirements of EU Data Protection Law.
- Where we act as a Data Processor, we process Personal Information on behalf of the Data Controller and upon its instructions as provided in the Mastercard Rules or in a specific agreement between Mastercard and the Data Controller.

The following describes how we respect the principles of EU Data Protection Law, including how we cooperate with our customers to ensure respect of those principles:

##### 1. Transparency & Fairness

**The Mastercard BCRs Entities provide Individuals with clear information on how we process Personal Information.**

Transparency is a key value at Mastercard. We provide Individuals with a number of online and offline privacy notices, including our Global Privacy Notice and program-specific privacy notices. All our privacy notices include, at the minimum, the information required by the GDPR (such as the identity and contact details of the controller and the Data Protection Officer, the purpose(s) of the Processing and related legal grounds, the categories data recipients, and data transfers), and a link to the BCRs.

Our BCRs inform Individuals about:

- (i) the data protection principles we apply when processing Personal Information (Section IV),
- (ii) the liability regime applicable to such Processing (Section VI);
- (iii) their third party beneficiary rights with regard to such Processing and how to exercise those rights (Section VI.2).

All Individuals have the right to easily access the BCRs. A public version of the BCRs will be published on Mastercard's public website, and Mastercard BCRs will be available on Mastercard's intranet.

## 2. Legal Ground For Processing

**The Mastercard BCRs Entities only process Personal Information if they can rely on one of the limited legal grounds provided by EU Data Protection Law.**

When a Mastercard BCRs Entity acts as a Data Controller, our Privacy & Data Protection Team reviews Personal Information Processing operations and ensures that the Processing is based on a legal ground for processing Personal Information, including for example:

- Individuals have unambiguously given their consent to the Processing of Personal Information;
- The Processing is necessary for the performance of a contract to which the Individual is a party or in order to take steps at the request of the Individual prior to entering into a contract;
- The Processing is necessary for compliance with a legal obligation or other regulatory obligations; or
- The Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by the third party or parties to whom Personal Information is disclosed, except where such interests are overridden by the interests or fundamental rights and freedoms of the Individual.

Where we act as Data Processor, we process Personal Information at the direction of the Data Controller who is responsible for ensuring a valid legal ground for the Processing.

## 3. Sensitive Data

**The Mastercard BCRs Entities only collect Sensitive Data when absolutely necessary for the purpose of the Processing and if they can rely on one of the limited legal grounds provided under EU Data Protection Law.**

Certain categories of Personal Information are Sensitive Data and receive a higher level of protection under EU Data Protection Law.

When a Mastercard BCRs Entity acts as a Data Controller, we process Sensitive Data only in limited circumstances, and will not process Sensitive Data unless the Processing is based on a legal ground for processing Sensitive Data, including for example:

- Individuals have given their explicit consent to the Processing;
- The Processing relates to Sensitive Data which is manifestly made public by the Individual;



- The Processing is necessary for the establishment, exercise or defence of legal claims by Mastercard;
- The Processing is necessary for the purpose of carrying out the obligations and specific rights of Mastercard in the field of employment law; or
- The Processing is necessary to protect the vital interests of the Individuals or another person where the Individual is legally or physically incapable of giving his or her consent.

#### 4. Data Quality

**The Mastercard BCRs Entities comply with the data quality principle.**

When a Mastercard BCRs Entity acts as a Data Controller:

- The Mastercard BCRs Entities ensures that Personal Information is:
  - Kept up-to-date (data accuracy);
  - Adequate, relevant and not excessive in relation to the purpose for which the information was collected and processed (data minimization);
  - Not retained for longer than is necessary for the purpose(s) for which it was originally collected, unless legislation requires us to maintain it (limited storage periods).
- Our transaction processing system is designed to minimize the amount of Personal Information collected and for that purpose relies primarily on the personal account number (and not on other directly identifiable information).
- We have implemented a records retention policy that sets out the appropriate time periods for which the Mastercard BCRs Entities will retain data, including Personal Information, in accordance with applicable law.

When a Mastercard BCRs Entity acts as a Data Processor, it will cooperate with and assist the Data Controller to comply with EU Data Protection Law, in particular it will comply with requests from the Data Controller:

- To update, correct or delete Personal Information, and will inform all Mastercard BCRs Entities to whom the data have been disclosed of the required update, correction or deletion of the Personal Information.
- To delete or anonymize the Personal Information as of the date when there is no justification to the retention of the data in an identified format, and will inform all Mastercard BCRs Entities to whom the Personal Information have been disclosed of the required deletion or anonymization of the Personal Information.

The Mastercard BCRs Entity acting as a Data Processor will comply with the above requests unless legislation imposed upon the Mastercard BCRs Entity prevents it from returning or destroying all or part of the Personal Information, in which case it will protect the confidentiality of the Personal Information and will not actively process it anymore.



## 5. Purpose Limitation

**Mastercard BCRs Entities only collect Personal Information for specified, explicit and legitimate purposes and do not further process it in a way incompatible with those purposes.**

When a Mastercard BCRs Entity acts as a Data Controller, we ensure that Personal Information is collected and processed only for specific and legitimate purposes and that it is not further processed in ways incompatible with the purposes of the collection.

One of the ways Mastercard ensures compliance with this principle is by embedding privacy and data protection standards into the product development lifecycle. As part of our product development process, the Privacy & Data Protection Team reviews the collection and use of Personal Information on a case-by-case basis to ensure that the Processing is undertaken for specific and legitimate purposes and is compatible with the purpose for which the Personal Information was collected. We embed these requirements into our technology wherever feasible to do so.

When a Mastercard BCRs Entity acts as a Data Processor, we comply with the following requirements:

- We only process Personal Information on behalf of the Data Controller and in compliance with its instructions, including with regard to transfers of Personal Information to a third country. If a Mastercard BCRs Entity cannot comply with the Data Controller's instructions, it will inform promptly the Data Controller of its inability to comply, if possible before the Processing takes place, and unless a law prohibits such notice on important grounds of public interest. Once the Data Controller is notified, it is entitled to suspend the transfer of Personal Information and/or terminate the contract.
- We take steps to return, destroy or fully anonymize the Personal Information of our customers, acting as Data Controllers, on the termination of the provision of services related to the data Processing, unless otherwise legally permitted to continue processing the data (in which case we will only process the data to the strict extent permitted by applicable law).
- We fully cooperate with our customers to assist them in their role as Data Controllers to fulfil their data protection compliance obligations in accordance with EU Data Protection Law.
- When we use our Sub-Processors, including internal Sub-Processors, we make sure they process the Personal Information in line with the instructions of our customers acting as Data Controllers.

## 6. Rights Of Individuals

**The Mastercard BCRs Entities comply with Individuals' requests to exercise their rights under EU Data Protection Law.**

When a Mastercard BCRs Entity acts as a Data Controller, we ensure that Individuals can exercise their right to:

- Access copies of Personal Information relating to them and receive some Personal Information in a structured, commonly used and machine-readable format to transmit it to another Data Controller;

- Obtain rectification or erasure of Personal Information relating to them or restriction of the Processing;
- Object, on grounds relating to their particular situation, to the Processing of their Personal Information;
- Object to the Processing of their Personal Information for the purpose of direct marketing.

Where we act as Data Processor, we require our customers to develop and implement appropriate procedures for handling Individuals' requests exercising their rights to access, rectify, or erase their Personal Information, restrict or object to the Processing of their Personal Information, or exercise their right to data portability. We do not reply to Individuals' requests to exercise their rights unless authorized or required to do so by our customers, but instead transmit them to our customers. We cooperate and support our customers in responding to such Individuals' requests, and have implemented technical and organizational measures for that purpose.

## 7. Automated Decision Making

**The Mastercard BCRs Entities comply with the restrictions applicable to automated decisions making under EU Data Protection Law.**

When a Mastercard BCRs Entity acts as a Data Controller, we ensure that Individuals are not subject to a decision which produces legal effects or that similarly significantly affects them and which is based solely on automated Processing of Personal Information, including Processing intended to evaluate certain personal aspects relating to them, such as their performance at work, creditworthiness, reliability, conduct, unless the Processing is:

- Necessary for entering into or performing a contract between the Individual and Mastercard;
- Authorized by a law requiring that measures be implemented to safeguard the Individual's legitimate interests.
- Authorized by the Individual who has provided his or her explicit consent to such Processing.

When the processing is based on Individuals' consent or is necessary for entering into or performing a contract, Mastercard will implement safeguards to protect Individuals' rights, freedoms and legitimate interest, at least the right to obtain human intervention, to express his or her point of view and to contest the decision.

## 8. Data Security

**The Mastercard BCRs Entities implement appropriate technical and organizational measures to protect Personal Information.**

Information security is at the heart of Mastercard's business model. Mastercard continuously innovates to make electronic payments even more secure. We have introduced chip and pin technology and more recently the digitization and tokenization of payment cards on electronic devices. Mastercard and its peers developed the industry standard for the protection of payment card data (Payment Card Industry PCI data security standards) that is used globally by all parties involved in processing card transactions, including financial institutions and merchants.

Mastercard has implemented and commits to maintain a comprehensive written information security program that complies with EU Data Protection Law, as well as all other applicable privacy, data protection and information security requirements, including U.S. banking safety and security standards. Mastercard is audited for compliance with those banking security standards by U.S. banking regulators on an annual basis. In addition, Mastercard's information security program is audited by an independent third party auditor on an annual basis in accordance with established audit standards (SSAE 16).

Mastercard commits to implement state-of-the-art measures to secure Personal Information. In particular, Mastercard's information security program includes appropriate technical, physical, administrative, and organizational measures and safeguards designed to:

- Ensure the security and confidentiality of Personal Information;
- Protect against anticipated threats or hazards to the security and integrity of Personal Information;
- Protect against any actual or suspected accidental or unlawful destruction, loss, alteration, unauthorized disclosure, acquisition, use or access or any other unlawful forms of Processing of any Personal Information transmitted, stored or otherwise processed.

These measures include the following controls:

- Access controls of persons;
- Data media controls;
- Data memory controls;
- User controls;
- Personal controls;
- Access controls of data;
- Transmission controls;
- Input controls;
- Instructional controls.

For situations where a Mastercard BCRs Entity acts as a Data Controller, Mastercard's information security program ensures a level of security appropriate to the risks represented by the Processing and the nature of the data, as well as the state of the art and cost of implementation of those safeguards. Our program is reviewed at least annually to ensure that it is responsive to new and emerging threats to security. Where Sensitive Data is processed, Mastercard implements enhanced security measures as appropriate to the heightened risks of the Processing. We also require our Data Processors or Sub-Processors to maintain strong information security safeguards.

Where we act as Data Processor, we implement appropriate technical and organizational measures to ensure a level of security appropriate to the risks presented by the Processing in accordance with the GDPR, in particular:

- We and our Sub-Processors assist the Data Controller in ensuring compliance with its obligations under Articles 32 to 36 of the GDPR, taking into account the nature of the Processing and information available.

- We and our Sub-Processors comply with security obligations equivalent to those imposed on the Data Controller by EU Data Protection Law, in accordance with the Mastercard Rules.

In case of Personal Data Breach, all Mastercard BCRs Entities will notify without undue delay Mastercard Europe SA and Mastercard's Data Protection Officer, who will document the Personal Data Breach. We will notify a Personal Data Breach as follows:

- Where the Personal Data Breach is likely to result in a risk to Individuals' rights and freedoms, we will notify the competent Data Protection Authority.
- When the Personal Data Breach is likely to result in a high risk to Individuals' rights and freedoms we will also notify Individuals of the Personal Data Breach.
- When we act as a Data Processor, we inform the Data Controller without undue delay after becoming aware of any Personal Data Breach.

## 9. Onward Transfers

**The Mastercard BCRs Entities only complete onward transfers to a Data Controller, a Data Processor or a Sub-Processor in compliance with the BCRs and the GDPR requirements applicable to Data Processors and Data Transfers.**

### A. Onward Transfers To Data Controllers And Data Processors

The following section applies when Mastercard acts as a Data Controller.

The Mastercard BCRs Entities only communicate Personal Information to: (1) another Mastercard Data Controller in compliance with the BCRs, including with the transparency requirements and purpose limitation principle; and (2) a non-Mastercard Data Controller located outside of Europe if it complies with EU Data Protection Law and with the legal requirements applicable to data transfers (in particular Articles 45, 46 and 47 of the GDPR) .

In addition, any Data Processor, including an internal Data Processor (i.e., a Mastercard BCRs Entity) and an external Data Processor (i.e., non-Mastercard entity or a Mastercard entity which is not bound by the Mastercard BCRs), who may receive or process Personal Information on behalf of a Mastercard BCRs Entity is subject to a rigorous due diligence process. The facts gathering and the security aspect of the diligence process is led by Third Party Risk Management (TPRM), in collaboration with the Privacy & Data Protection Team. The findings of the due diligence are reviewed by the Privacy & Data Protection Team to ensure that our Data Processors apply appropriate protections to the data and that Mastercard complies with the legal requirements applicable to Data Processors and data transfers (in particular Articles 28, 29, 32, 45, 46 and 47 of the GDPR). The result of the diligence process is documented in a report, which includes any required risk mitigation measures. The process is repeated on an annual basis.

In particular, the Privacy & Data Protection Team ensures that:

- Where a Mastercard BCRs Entity uses an internal Data Processor to process Personal Information on its behalf and under its instructions, the Processing takes place in accordance with the BCRs.
- Where a Mastercard BCRs Entity uses an external Data Processor to process Personal Information on its behalf, the external Data Processor is bound by way of a written agreement to comply with data protection obligations in accordance with Article 28 of the GDPR, including:

- Process Personal Information only on behalf of and under the instructions of the Mastercard BCRs Entity which acts as the Data Controller;
- Implement and maintain appropriate technical and organizational measures to protect Personal Information against unauthorized access or disclosure, including by way of a comprehensive written information security program. Having regard to the state of the art and the cost of their implementation, such measures ensure a level of security appropriate to the risks represented by the Processing and the nature of the Personal Information to be protected.
- Inform the Mastercard BCRs Entity if it cannot comply with its data protection obligations, when there is a Personal Data Breach, an information security incident, or when it receives requests from Individuals or from a public authority;
- Only transfer Personal Information outside of Europe in compliance with Articles 45, 46 and 47 of the GDPR;
- Only sub-contract the Processing of Personal Information with the prior written consent of the Mastercard BCRs Entity which acts as the Data Controller and under an agreement that imposes on the Sub-Processor the same data protection obligations as set out in the contract between the Mastercard BCRs Entity and the external Data Processor;
- Ensure that persons authorized to process the Personal Data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;
- Assist the Mastercard BCRs Entity to ensure compliance with its obligations pertaining to the security of the Personal Data, data protection impact assessments and related prior consultations;
- At the choice of the Mastercard BCRs Entity, delete or return the Personal Data to the Mastercard BCRs Entity after the end of the provision of the services;
- Make available to the Mastercard BCRs Entity information necessary to demonstrate compliance with its obligations under the agreement and inform the Mastercard BCRs Entity if, in its opinion, an instruction infringes EU Data Protection Law;
- Remain liable to the Data Controller for the performance of the external Data Processor's obligations.

## **B. Onward Transfers To Sub-Processors**

The following section applies when Mastercard acts as a Data Processor.

The Mastercard BCRs Entities only use internal Sub-Processors (i.e., a Mastercard BCRs Entity) or external Sub-Processors (non-Mastercard entities) in accordance with the Data Controller's instructions and the informed general or specific authorization provided in the Mastercard Rules or the specific data processing agreement between the Data Controller and the Mastercard BCRs Entity.

When we use external Sub-Processors, we bind them via a written agreement to ensure that they comply with the same obligations as are imposed by the Mastercard BCRs on Mastercard, via the Mastercard Rules or the specific agreement between the Data Controller and the Mastercard BCR Entity acting as Data Processor.

When the Data Controller gives a general authorization to the Mastercard BCRs Entity to use Sub-Processors, the Mastercard BCRs Entity commits to provide the Data Controller with a list

of Sub-Processors and to inform the Data Controller of any addition or replacement of a Sub-Processor in a timely fashion so as to give the Data Controller an opportunity to object to the change or to terminate the contract before the Personal Information is communicated to the new Sub-Processor, except where the service cannot be provided without the involvement of a specific Sub-Processor.

In addition, Mastercard complies with the following requirements when sub-processing Personal Information:

- Our internal Sub-Processors are bound to respect our BCRs and only process Personal Information in line with the instructions of the Data Controllers which are specified in the Mastercard Rules or in a specific agreement.
- The Privacy & Data Protection Team ensures that Mastercard BCRs Entities only use Sub-Processors when appropriate data protection guarantees are implemented in accordance with Articles 28, 29, 32, 45, 46, 47 of the GDPR, in compliance with the Data Controller's instructions and prior authorization and the requirements outlined above for agreements with external Data Processors.

## **10. Accountability**

Where we act as Data Controller, we implement appropriate technical and organizational measures to ensure and to be able to demonstrate compliance with the BCRs, in particular:

- We carry out data protection impact assessments for Processing operations that are likely to result in a high risk to the rights and freedoms of Individuals and consult the relevant DPA, where required under EU Data Protection Law.
- We implement appropriate technical and organizational measures designed to implement data protection principles and to facilitate compliance with the requirements set up by the BCRs (data protection by design and by default).

When we act as a Data Processor:

- We make available to the Data Controller information necessary to demonstrate compliance with its obligations and allow for and contribute to audits as provided in our BCRs.
- We inform the Data Controller if, in our opinion, an instruction infringes EU Data Protection Law.
- We assist the Data Controller in implementing appropriate technical and organizational measures to comply with data protection principles and facilitate compliance with the requirements set up by the BCRs, such as data protection by design and by default.

Whether we act as a Data Controller or a Data Processor, we maintain a record of Processing activities and make it available to the relevant DPA upon request.

## **V. How Do We Ensure Privacy Compliance?**

The Privacy & Data Protection Team is responsible to ensure compliance with the BCRs requirements under senior executive oversight. Mastercard has a global team of dedicated privacy, data protection and security professionals responsible for administering our privacy and data protection programs.

Mastercard provides regular privacy and data protection training and awareness to Mastercard



Staff globally, and all Mastercard Staff are required to comply with Mastercard's data protection policies and procedures. Mastercard's privacy and data protection program is subject to regular internal and external reviews and audits.

### **1. The Mastercard Privacy & Data Protection Team**

The Privacy & Data Protection Team is in charge of ensuring compliance with the BCRs requirement and is led by Mastercard's Chief Privacy Officer who is an Executive Vice President and reports directly to our General Counsel. Our General Counsel is a member of Mastercard's Management Committee which reports to Mastercard's Chief Executive Officer.

Mastercard ensures that the Privacy & Data Protection Team has enough human and financial resources to complete its tasks efficiently and in accordance with EU Data Protection Law. In particular, the Privacy & Data Protection Team is composed of a network of qualified data professionals as well as privacy and data protection lawyers devoting 100% of their time to privacy and data protection law. They are located in Mastercard main offices worldwide, including in the U.S., Belgium, the UK and Singapore. Senior privacy & data protection lawyers are in charge of supervising and coordinating compliance with applicable data protection rules globally. They report to Mastercard's Chief Privacy Officer and are assisted by mid-level and junior privacy and data protection lawyers. The exact structure of the Privacy & Data Protection Team is subject to change as Mastercard business evolves rapidly. An organigram of the Privacy & Data Protection Team is available upon request.

The Privacy & Data Protection Team is responsible for ensuring that the Processing of Personal Information by the Mastercard BCRs Entities is legally compliant, as well as ethical. Accordingly, the team is responsible for:

- Supervising and implementing the BCRs;
- Ensuring compliance with the requirements of the BCRs;
- Updating the BCRs in compliance with internal governance procedures;
- Handling requests and complaints of Individuals in relation to the BCRs.

### **2. Senior Executive Oversight**

Mastercard's commitment to privacy starts at the highest levels of the organization, with our Board of Directors, Chief Executive Officer, General Counsel, Executive Vice President Chief Data Officer, Executive Vice President Chief Privacy Officer and our Executive Vice President Chief Security Officer. Mastercard's Chief Privacy Officer is an Executive Vice President and reports directly to our General Counsel. Our General Counsel is a member of Mastercard's Management Committee which reports to Mastercard's Chief Executive Officer.

### **3. Data Protection Officer**

Mastercard has appointed a Data Protection Officer ("DPO"), who monitors compliance with the BCRs and is responsible for the following tasks:

- Informing and advising Mastercard and Mastercard Staff in all matters related to the Processing of Personal Information and their obligations under EU Data Protection Law;
- Monitoring compliance with EU Data Protection Law and Mastercard's policies, including the assignment of responsibilities, awareness-raising and training of

Mastercard Staff involved with the Processing of Personal Information and related audits;

- Providing advice regarding data protection impact assessments upon request;
- Acting as a contact point for Individuals in relation to all issues related to the Processing of their Personal Information and to the exercise of their rights under EU Data Protection Law;
- Cooperating with DPAs, for which he or she may act as a contact point.

The DPO has been provided with the necessary resources to carry out his or her tasks. He or she enjoys the highest management support for the fulfilment of these tasks and does not receive instructions in this regard.

#### **4. Privacy and Information Security Officers**

The Privacy & Data Protection Team is supported in certain jurisdictions by data protection lawyers and information security officers. In addition, we have appointed Business Unit Records Management Champions globally, who sit in a variety of business and support functions, and who promote employee awareness about data protection, records retention and these BCRs. The Privacy & Data Protection Team also works closely with multiple teams around the globe, including the Corporate Security Team as well as the Information Incident Response and Records Retention teams, to ensure that our privacy and data protection program and these BCRs are effectively implemented.

#### **5. Training & Awareness**

Mastercard BCR Entities provide appropriate training on the BCRs to Mastercard Staff who have permanent or regular access to Personal Information, who are involved in the Processing of Personal Information or are involved in the development of tools used to Process Personal Information.

Mastercard's Privacy & Data Protection Team provides Mastercard Staff with engaging, relevant and up-to-date training about a variety of privacy and data-related topics, including Mastercard's policies and procedures as well as these BCRs. Mastercard's privacy training program is designed to provide Mastercard Staff with the knowledge, tools and resources they need to protect Personal Information and is tailored according to role, function, and access to Personal Information.

All Mastercard Staff are required to take a mandatory data protection course and the completion of the course is audited. Specialized training modules are also provided for Mastercard Staff in specific roles, functions or in specific jurisdictions. We use interactive methods to deliver training including videos, webcast programs, live fora and social activities to stress the importance of data protection and the role of our BCRs to all Mastercard Staff.

#### **6. Control & Audit**

Mastercard commits to conduct data protection audits on a regular basis or on specific request from the Privacy & Data Protection Team.

Mastercard commits to take the following actions to control compliance with EU Data Protection Law, including all the requirements of the BCRs, by:

- Carrying out audits for compliance on a regular basis both internally and by appointing external auditors where needed and upon request;



- Designating the internal audit team as the department responsible for carrying out internal audit, and the internal audit team and the Privacy & Data Protection Team as the department responsible to design the scope of each audit of the BCRs based on a risk-based approach and in relation to the particular risks presented at the time of the audit;
- Communicating the results of the audit to the internal audit team, the Data Protection Officer, the Privacy & Data Protection Team and the Mastercard Board;
- Ensuring that corrective actions take place based on the results of the audit;
- Providing the Belgian DPA, other competent DPAs and customers with the result of the audit report upon request and under the strictest confidentiality obligations;
- Allowing the Belgian DPA and other competent DPAs to verify compliance of any Mastercard BCR entity with EU Data Protection Law and the BCRs in accordance with applicable law, in particular in respect of the highest confidentiality requirements, and without creating risks for the security, integrity and confidentiality of Mastercard's payment network and of the global financial system; and
- Cooperating with DPAs with regard to any questions relating to the Processing of Personal Information by the Mastercard BCR Entities.

None of the above confidentiality requirements should limit the Belgian DPA's or other competent DPAs' ability to issue enforcement notice, in compliance with applicable law, where corrective action arising from the audit is ignored.

Where we act as Data Processor and subject to the strictest confidentiality obligations, we allow the Data Controller to request an audit of our data protection compliance program by external independent auditors, which are jointly selected by Mastercard and the Data Controller. The external independent auditor cannot be a competitor of Mastercard. Mastercard and the Data Controller will mutually agree upon the scope, timing, and duration of the audit. Mastercard will make available to the Data Controller the result of the audit of its data protection compliance program. The Data Controller must reimburse Mastercard for all expenses and costs for such an audit. In addition to the above, if the Data Controller requesting the audit is a competitor of Mastercard, Mastercard will be entitled, in cooperation with the jointly selected external auditor, to redact any commercially sensitive and confidential information from the audit report.

In addition, we bind our external Sub-Processors to: (1) provide Mastercard with the necessary information to help us verify the Sub-Processor's compliance with its data protection obligations; and (2) where necessary allow Mastercard to perform or order an on-site audit of the procedures relevant to the protection of Personal Information on behalf of our customers, acting as Data Controllers.

## **VI. Liability**

### **1. Responsibility Of Mastercard BCR Entities**

The Mastercard BCRs are enforced by all Mastercard BCRs entities in accordance with an Intra-Group Agreement. Each Mastercard BCRs Entity is responsible for complying with the BCRs.

In addition to the individual responsibility of Mastercard BCRs Entities, Mastercard Europe SA accepts responsibility and agrees to:

- Take the necessary action to remedy breaches of these BCRs caused by other Mastercard BCRs Entities located outside of Europe, and contractual breaches caused by Data Processors or Sub-Processors located outside of Europe.
- Pay compensation for any material or non-material damages incurred as a result of such breaches by a Mastercard BCRs Entity, a Data Processor or a Sub-Processor, unless Mastercard Europe SA can demonstrate that the damage could not be attributed to a Mastercard BCRs Entity, a Data Processor and a Sub-Processor.

Mastercard Europe SA confirms that it has sufficient assets to pay compensation for damages resulting from the breach of the BCRs.

## **2. Third Party Beneficiary Rights**

In situations where Mastercard acts as a Data Controller, Individuals have the right to enforce the BCRs as third-party beneficiaries, including:

- The data protection principles and Individual's rights (Section IV);
- The right to complain through the internal complaint mechanism (Section VIII.1);
- The right to lodge a complaint with a DPA and to seek judicial remedies and to claim compensation in Courts (Section VIII.2);
- The process for handling conflicts of law (Section IX);
- The duty to cooperate with DPAs (Section VIII.3);
- This section on liability.

Therefore, if a Mastercard BCRs Entity violates the BCRs, courts and DPAs in Europe will have jurisdiction and Individuals will have the rights and remedies against Mastercard Europe SA as if Mastercard Europe SA had committed the violation in the country in which Individuals are located (instead of the country of the Mastercard BCRs Entity outside of Europe).

When we act as Data Processor on behalf of customers, customers believing that our BCRs are not complied with have the right to enforce the BCRs against any Mastercard BCRs entity for breaches they caused and the right to seek a judicial remedy or claim compensation from Mastercard, including for breach of the BCRs caused by internal or external Sub-Processors. Moreover, customers have the right to enforce the BCRs against Mastercard Europe SA for breach of the BCR or of the data processing agreement by internal or external Sub-Processors.

In addition, in situations where Mastercard acts as a Data Processor, Individuals have the right to enforce the BCR as third-party beneficiaries directly against Mastercard where:

- The requirements at stake are specifically directed to Data Processors in accordance with the GDPR, in particular the duty to (i) respect the instructions received from the Data Controller, (ii) implement appropriate technical and organizational security measures, (iii) notify any Personal Data Breach to the Data Controller, (iv) respect the conditions to engage a Sub-Processor, (v) cooperate with and assist the Data Controller in complying and demonstrating compliance with the law, (vi) provide easy access to BCRs, (vii) grant a right to complain through an internal complaint mechanism, (viii) cooperate with the DPA; as well as requirements pertaining to (xi) liability, compensation and jurisdiction and (x) conflicts of law.

- They are not able to bring a claim against the Data Controller because the Data Controller has factually disappeared or ceased to exist in law or has become insolvent, unless any successor has assumed the entire legal obligations of the Data Controller by contract or by operation of law, in which case the Individuals can enforce their rights against such entity. In those situations, Individuals have the right to enforce Sections II, IV.1, IV.10, VI, VIII.1, VIII.3 and IX and Appendix 1 of the BCRs against Mastercard Europe SA.

In the above scenarios, Individuals are entitled to:

- Lodge a complaint before the DPA of the EU Member State of his or her habitual residence, place of work or place of alleged infringement and take action against Mastercard before the Courts where the Data Controller or Mastercard has an establishment or where the Individual has his or her habitual residence.
- Obtain compensation and to remedy breaches of the BCRs. Where Mastercard, acting as a Data Controller or a Data Processor, and another third party involved in the same Processing are found responsible for any damage caused by such Processing, Individuals are entitled to receive compensation for the entire damage directly from Mastercard and the other third party involved in the Processing.
- Obtain a copy of the public version of the BCRs, including its appendixes, and a copy of the Intra-Group Agreement (without any sensitive and confidential commercial information).

### **3. Burden Of Proof**

Where Individuals or customers bring a claim or proceeding for a violation of the Mastercard BCRs and can demonstrate that they have suffered damage and establish facts which show that it is likely that the damage occurred because of a violation of the Mastercard BCRs or contractual breaches caused by Data Processors or Sub-Processors located outside of Europe, Mastercard Europe SA is responsible for proving that the Mastercard BCRs Entity outside of Europe, the external Data Processors and Sub-Processor were not responsible for the violation giving rise to that damage or that no violation occurred. Where Mastercard Europe SA is successful in proving that the Mastercard BCRs Entity outside of Europe, the Data Processor and the Sub-Processor are not responsible for the violation, Mastercard Europe SA may discharge itself from any responsibility.

## **VII. Updates To The BCRs**

We may update our BCRs to reflect, for example, changes in our Personal Information practices, modifications of the regulatory environment or our company structure.

We commit to report changes to our BCRs without undue delay to all Mastercard BCRs Entities and to the Belgian DPA, and where necessary, we will seek a new approval of the BCRs. However, in certain situations, we may update the BCRs, including the list of Mastercard Entities bound by the BCRs, without re-applying for an approval. In addition to the above, where we act as Data Processor and where a change affects the processing conditions, we will inform the Data Controller in a timely fashion so as to give the Data Controller the opportunity to object to the change or to terminate the contract before the modification is made.

## VIII. How Can You Lodge A Complaint And Enforce The BCRs?

### 1. Internal Complaint Handling

We have implemented internal policies, processes and procedures to allow Individuals to exercise their rights and to manage complaints regarding our Personal Information practices, and these are overseen by the Privacy & Data Protection Team, Mastercard's top management and the Data Protection Officer.

In situations where Mastercard acts as a Data Controller:

- If an Individual or a customer has reasons to believe that a Mastercard BCRs Entity has not complied with the BCRs, they can lodge a complaint with the Data Protection Authority or the courts of their country of residence or directly with Mastercard.
- To lodge a complaint with Mastercard, Individuals can proceed in the following ways:
  - E-mail us at: [BindingCorporateRules@mastercard.com](mailto:BindingCorporateRules@mastercard.com) by including the term "BCRs" in the subject line; or
  - Write to us at: Privacy & Data Protection Team, Mastercard Europe SA, Chaussée de Tervuren 198A, B-1410 Waterloo, Belgium.
- All complaints are handled by our Privacy & Data Protection Team, assisted by the Data Protection Officer, as follows:
  - We review the complaint and send an acknowledgement of receipt within ten (10) working days.
  - We then investigate the complaint and respond to it as soon as possible and within one month of receipt.
  - If the complaint is particularly complex, or given the number of complaints, Mastercard will provide an estimate of when the response will be provided to the complainant and in any event the response will be provided within three months of the receipt and will explain why it needs extra-time.
- If the complaint is upheld, Mastercard BCRs Entities take appropriate remedial measures as necessary to resolve the complaint and ensure compliance with the BCRs as appropriate.
- If an Individual is not satisfied with the response from the Privacy & Data Protection Team, that Individual can lodge a complaint with the competent Data Protection Authority or lodge a claim with a court of competent jurisdiction, preferably the Belgian DPA or the courts of Belgium.

Where we act as Data Processor, we strongly encourage Individuals to first seek to contact the relevant Data Controller. If we receive a complaint directly from an Individual, our Privacy & Data Protection Team will review the complaint and will forward it to the relevant Data Controller, unless the Data Controller has ceased to exist or became insolvent in which case the complaint is handled by Mastercard as described above.

### 2. Redress for Individuals

In addition to the internal complaint described above, Individuals can seek redress by: (1) lodging a complaint with a Data Protection Authority; and (2) seeking a judicial remedy or claiming compensation in court. Individuals are free to lodge a complaint with a Data

Protection Authority, seek a judicial remedy or claim compensation in court regardless of whether they have first lodged a complaint with Mastercard.

To ensure the best possible cooperation and efficiency in relation to complaints, it is preferable that Individuals exercise their rights before the Belgian DPA or the courts of Belgium. However, this does not preclude them from their right to enforce the BCRs before the Data Protection Authority or the courts of the Individual's country of residence.

When we act as Data Processor on behalf of customers, customers who believe that our BCRs are not complied with have the right to seek a judicial remedy or claim compensation from Mastercard, including for breach of the BCRs caused by internal or external Sub-Processors.

### **3. Duty of Cooperation**

Mastercard BCR Entities will cooperate with requests, queries or complaints from Individuals, Data Controllers and Data Protection Authorities. Mastercard BCR Entities will follow the recommendations of the Belgian DPA and other competent DPAs regarding the implementation of the BCRs.

## **IX. How Do We Handle Potential Conflicts Of Law?**

Where local law is likely to prevent a Mastercard BCRs Entity from fulfilling its obligations under these BCRs and where complying with such local law is likely to have a substantial adverse effect on the guarantees provided by these BCRs, the matter is referred to the Privacy & Data Protection Team for resolution. Our Privacy & Data Protection Team reviews each matter on a case-by-case basis and documents it internally.

If we receive an access request for Personal Information by a law enforcement authority or state security body ("requesting agency"), the Privacy & Data Protection Team responds to the enquiry by informing the requesting agency about our limited data set. We also refer the requesting agency to the appropriate financial institution, which holds more comprehensive information about the relevant cardholder.

Where the requesting agency pursues the request, we ensure that it follows the required legal process for its country and jurisdiction, including any applicable privacy safeguards. If there is a question about the legitimacy or scope of the request, we challenge it. Only when we are satisfied that the legal process is valid and appropriate, and when we are convinced that the request does not prevent a Mastercard BCRs Entity from fulfilling its obligations under these BCRs and does not have a substantial effect on the guarantees provided by them, do we deliver the narrowest possible set of data required to be responsive to the request while ensuring data minimization.

If we do not manage to resolve the conflict of laws, the Privacy & Data Protection Team will use its best efforts to put the access request on hold for a reasonable delay in order to consult with the Belgian DPA on how to resolve it, unless otherwise prohibited by applicable law, such as a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation.

Mandatory requirements of local law applicable to a Mastercard BCRs Entity, which are not massive, disproportionate, indiscriminate and do not go beyond what is necessary in a democratic society on the basis of one of the interests listed in Article 23 of the GDPR are in principle not in contradiction with Mastercard BCRs and thus do not require consultation with the Belgian DPA. However, in case of doubt, Mastercard will consult with the Belgian DPA.

When the suspension and/or notification are prohibited, such as in case of a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation, Mastercard will use its best efforts to obtain the right to waive this prohibition in order to communicate as much information as it can and as soon as possible to the Belgian DPA, and be able to demonstrate that it did so. If despite having used its best efforts, Mastercard is not in a position to notify the Belgian DPA, it will provide general information on the requests (e.g., number of applications for disclosure, type of Personal Information requested, requesting agency if possible) to the Belgian DPA upon request or whenever needed.

In addition to the above, where a Mastercard BCRs Entity acts as Data Processor, we notify the Data Controller when local laws prevent the Mastercard BCRs Entity (1) from fulfilling its obligations under these BCRs and have a substantial adverse effect on the guarantees provided by these BCR, and (2) from complying with the instructions received from the Data Controller via the Mastercard Rules or the data processing agreement between Mastercard and the Data Controller. We do not notify Data Controllers if such disclosure is prohibited by applicable law, such as a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation. The Data Controller is responsible for notifying its competent Data Protection Authority if applicable and as authorized under applicable law.

### Appendix 1 Mastercard Entities Covered By The BCRs

Mastercard BCR Entities and Mastercard Staff are bound to respect the BCRs. At a high-level, Mastercard BCRs Entities are structured as follows:

- Mastercard Europe S.A., Waterloo, Belgium is the European headquarters of Mastercard.
- Mastercard International Incorporated is the global headquarters of Mastercard.
- All other entities are subsidiaries or affiliates of Mastercard Europe S.A., Waterloo, Belgium or Mastercard International Incorporated.

The following Mastercard BCR Entities have signed Mastercard’s Intra-group Agreement:

The following list is accurate as of December 2018. For a fully updated list of entities please contact the Privacy & Data Protection Team at [BindingCorporateRules@mastercard.com](mailto:BindingCorporateRules@mastercard.com).

<b>FOR EUROPE:</b>			
<b>Country</b>	<b>Mastercard BCRs Entity</b>	<b>Registration number</b>	<b>Contact Details</b>
Austria	Mastercard Europe S.A. Austria Representative Office, Austria	ATU642 17378	Mastercard Europe SA Wipplingerstraße 30/DG 1010 Vienna, Austria
	IfOnly Austria GmbH	FN 50 1126	Mooslackengasse 17, Austria 1190 Wien, Austria
Azerbaijan	Mastercard Europe SA Azerbaijan Representative Office, Azerbaijan	1403433041	AZ1078, Baku City, Nasimi District, Hasan Aliyev, 4/189, Falez Plaza, 6th Floor
Belarus	Mastercard Europe SA Belarus Representative Office	527053201	4-32 Zybityskaya Str., 2nd (second) floor No: 32-1, Minsk, Belarus 220030, Belarus
Belgium	Mastercard Europe S.A., Waterloo, Belgium	0448.038.446	Chaussée de Tervuren 198A B-1410, Waterloo, Belgium
	HomeSend SCRL Belgium	0549.987.927	Rue des Colonies 56, 1000 Bruxelles, Belgium
	Belgium Branch (Waterloo) of Maestro International Incorporated	0463.192.915	Chaussee de Tervuren 198A, Waterloo, Belgium 1410, Belgium
	Mastercard Jupiter Investments SPRL	0830.805.493	Chaussee de Tervuren 198A, Waterloo, Belgium 1410, Belgium
	Mobile Financial Services Holding SPRL	0829.715.729	Lxelles Avenue Louise 149/24, Brussels, Belgium 1050, Belgium
Bosnia & Herzegovina	Mastercard Europe S.A., Bosnia & Herzegovina Representative Office, Bosnia	4202169990006	BIH – Sarajevo 1 FRA Andela Zvizdovica Unitic Business Center, Building A Bosnia, Sarajevo



Bulgaria	Mastercard Europe S.A. Bulgaria Representative Office, Bulgaria	176381804	Boulevard Totleben, 53-55, Stolichna Municipality, Sofia BG-1506, Bulgaria
Bulgaria	Sel Int Ltd Bulgaria EOOD	200217365	Varna 9010, District of Varna, Municipality of Varna, Primorski area, 30, Prilep, Bulgaria
Croatia	Mastercard Europe S.A. Croatia Branch Office, Croatia	080867029	Zagreb Tower Radnicka cesta 80/8 10 000 Zagreb, Croatia
Czech Republic	Mastercard Europe S.A. Czech Republic Branch Office, Czech Republic	693 45 724	Palladium, Na Porici 1079/3a, 110 00 Prague 1, Czech Republic
	Session M Czech Republic s.r.o.	077 21 587	Pernerova 697/35, Karlin, 186 00 Prague 8, Prague Czech Republic
Denmark	Mastercard Europe S.A. Denmark Branch Office, Denmark	37501727	Gammel Kongevej 1 Copenhagen, 1610 Denmark
Finland	Mastercard Europe S.A. Finland Branch Office, Finland	2751634-9	Etelaesplanadi 2, 3C/4D Krs. Helsinki, 00130 Finland
France	Mastercard France SAS, France	501573158	112, Avenue Kleber 75784 Paris Cedex 16 France
	France Branch of HomeSend SPRL	821 562 360	31 Chemin du Vieux Chene, Meylan 38240, France
Georgia	Mastercard Europe S.A. Georgia Representative Office	404552649	2 Leonidze Str./1G Tabidze Str., No. 7 Floor 5, Mtatsminda District, Tbilisi, Georgia, Georgia
Germany	Mastercard Europe S.A. Germany Representative Office, Germany	006 412 000	Unterschweinstiege 10, 60549 Frankfurt/Main Germany
Greece	Mastercard Europe S.A. Greece Representative Office, Greece	998643769	23 Vasilissis Sofias Avenue 10674 Athens, Greece
	Mastercard Europe Greece Single Member S.A.	156214201000	Vasilissis Sofias Avenue No 23, Athens, Greece 10674, Greece
Hungary	Mastercard Europe S.A. Hungary Representative Office, Hungary	01-12-073361	Deak Ferenc Utca 5H – 1052 Budapest Hungary
Ireland	Ethoca Limited	412289	25/28 North Wall Quay, Dublin 1, Ireland
	Ethoca Nominees Limited	557283	25 - 28 North Wall Quay, Dublin 1, Ireland, Ireland
	Eurocommerce Call Centre Solutions Limited, Ireland	316850	Block C, Central Park, Dublin 18, Ireland
	Mastercard Ireland Limited, Ireland	499963	Mountain View, Central Park, Dublin 18, Ireland
	Orbis Patents Limited	285583	Mountain View, Central Park, Leopardstown, Dublin 18, Ireland, Ireland



Israel	Mastercard Israel LTD	515837888	Aluf Kalman Magen 3, Tel Aviv, 6107075 Israel
	Trans-Fast Payment Solutions Ltd	515751741	35 Jabotinsky Street, Ramat Gan 5251108, Israel
Italy	Mastercard Europe S.A. Italy Branch Office, Italy	97091560587	Piazza del Popolo 18, 1st Floor Roma, Italy - 00187
	IfOnly Italy S.R.L.	RM1558544	Roma (RM) Via Delle Quattro Fontane 15, Italy Cap 00184, Italy
Kazakhstan	Mastercard Europe S.A. Kazakhstan Representative Office, Kazakhstan	120542010604	CDC 2 Business Centre,240v Furmanov Street, Almaty, Kazakhstan
Lebanon	Mastercard Europe S.A. Lebanon Representative Office	2975	9th Floor, Achrafieh 5585 Building, Pierre El Gemayel, Palais de Justice District, P.O. Box 11-7236, Beirut, Lebanon, Lebanon
Netherlands	Mastercard Europe S.A. Dutch Branch Office, Netherlands	50304348	Gustav Mahlerplein 105-115, 1082 MS Amsterdam, The Netherlands
	Trans-Fast International Cooperatief, UA	59274034	Prins Hendriklaan 26,Amsterdam, Netherlands 1075BD, Netherlands
Norway	Mastercard Europe S.A. Norway Branch Office, Norway	816 220 122	Oslo, Aker Brygge, 2nd Floor, Filipstads Brygge 1, Norway
Poland	Mastercard Europe S.A. Poland Branch Office, Poland	0000345959	Plac Europejski 1 Warsaw Spire, 31st Floor 00-844 Warsaw, Poland
Poland	Mastercard Payment Transaction Services S.A. (FKA Trevica S.A.)	0000316035	ul. Dominikanska, 02-738, Warsaw, Poland
Portugal	Mastercard Europe S.A. Portugal Representative Office, Portugal	980276500	Avenida Da Liberdade 110, 1, Lisbon Portugal
Romania	Mastercard Europe S.A. Romania Branch Office, Romania	38645357	4-8 Nicolae Titulescu Street America House Building, West Wing, 2 <sup>nd</sup> Floor, 011141 Bucharest, Romania
Russia	Mastercard Europe S.A. Russia Representative Office, Russia	NAN 20150011134 TIN	10 Bolshaya Dmitrovka Street, Building 4, Moscow, Russian Federation, Russian Federation
	Mastercard OOO, Russia	11077463239 26	10 Bolshaya Dmitrovka St., Building 4,Moscow, Russia, Russian Federation
	CEL INT, Ltd UK (Moscow, Russia Rep Office)	TIN 99- 09311962	Moscow, Bolshoi Sergievsky 10, floor 1, apt. III
Serbia	Mastercard Europe S.A., Serbia Representative Office, Serbia	29026866	Milutina Milankovića 1ž, Entrance B, 5th floor, Belgrade, Serbia 11070, Serbia

Slovenia	Mastercard Europe S.A., Slovenia Branch	7203543000	Dimičeva ulica 013,Ljubljana 1000, Slovenia
Spain	Mastercard Europe S.A. Spain Branch Office, Spain	W0171837H	Paseo de la Castellana, 259 C, 11 <sup>a</sup> Torre Cristal / 28046 Madrid, Spain
	Mastercard Spain Holdings, Sociedad Limitada	M569558 Book 31651/90	Avenida de Concha Espina 39B,Madrid, Spain 28016, Spain
Sweden	Mastercard Sweden Services AB	559089-2138	Kungsgatan 33, 4th Floor SE-111 56 Stockholm, Sweden
Switzerland	Mastercard Europe S.A. Switzerland Branch Office, Switzerland	CHE- 110.335.313	Löwenstrasse 25 8001 Zürich
Turkey	Mastercard Europe S.A., Turkey Representative Office, Turkey	3810044245	Tamburi Ali Efendi Sok., No: 1334337 Etiler – Istanbul
Ukraine	Mastercard Europe S.A., Ukraine Representative Office	26600463	17/52 Bogdana Khmel'nitskogo street, floor 4 A, office 404 A, Kiev, Ukraine 01030, Ukraine
UK	Mastercard Prepaid Management Services Limited, UK	05429739	Access House, Cygnet Road Hampton, Peterborough, PE7 8FJ, United Kingdom
	Mastercard Payment Gateway Services Limited, UK	03430157	10 Upper Bank Street London, E14 5NP United Kingdom
	Mastercard Payment Gateway Services Client Finance Limited, UK	03565041	10 Upper Bank Street London, E14 5NP United Kingdom
	Mastercard Payment Gateway Services Group Limited	03168091	19th Floor, 10 Upper Bank Street,London, England E14 5NP, United Kingdom
	Mastercard Track Ltd.	3603992	10 Upper Bank Street, London, E14 5NP, United Kingdom
	Applied Predictive Technologies UK Ltd	06947472	4th Floor, 70 Conduit Street, London, England W1S 2GF, England, United Kingdom
	Mastercard UK Management Services Ltd, UK	4617367	10 Upper Bank Street, London, E14 5NP, United Kingdom
	Vocalink Holdings Limited	06119036	Drake House, Homestead Road, Rickmansworth, Hertfordshire, United Kingdom WD3 1FX, United Kingdom
	Vocalink Limited	06119048	1 Angel Lane, London, EC4R 3AB, United Kingdom
Vocalink International Limited	11646063	Drake House, Homestead Road, Rickmansworth, Hertfordshire, United Kingdom WD3 1FX, United Kingdom	

Voca Ltd	01023742	71-75 Shelton St, Convent Garden,London, United Kingdom WC2H9JQ, United Kingdom
Voca Pension Trustees Ltd	09655475	Drake House, Three Rivers Court, Homestead Road, Rickmansworth, Hertfordshire, United Kingdom WD3 1FX, United Kingdom
VocaLink Interchange Network Ltd	03565766	1, Angel Lane, 9th Floor,LONDON, United Kingdom EC4R 3AB, United Kingdom
VocaLink Retail Services Ltd	02094831	Drake House, Homestead Road, Rickmansworth, Hertfordshire, United Kingdom WD3 1FX, United Kingdom
Mastercard OB Services UK Limited	12507991	1 Angel Lane, London, England, EC4R 3AB
Mastercard Transaction Services (UK) Ltd.	07031967	1 Angel Lane, London, England, EC4R 3AB
CATSEC 401 Ltd	02999731	Drake House, Three Rivers Court, Rickmansworth, Hertfordshire, United Kingdom WD3 1FX, United Kingdom
CEL Int, Ltd UK	06678417	Studio 116, Grand Union Studios, 332 Ladbroke Grove, London, United Kingdom, United Kingdom
Ethoca Limited United Kingdom Branch	N/a	39 Houndsditch 2nd Floor London EC3A 7DB, United Kingdom
Global Mastercard Holdings LP	LP16352	10 Upper Bank Street,London, England E14 5NP, England
IPco 2012 Ltd	08330583	1, Angel Lane,London, United Kingdom EC4R 3AB, United Kingdom
Mastercard Europe Services Limited	09210818	10 Upper Bank Street, Canary Wharf,London, England E14 5NP, England
Mastercard Holdings LP	LP16341	10 Upper Bank Street, Canary Wharf,London England
Mastercard UK Holdco Limited	10255459	1 Angel Lane,London, United Kingdom EC4R 3AB, United Kingdom
Mastercard UK Inc Pension Trustees Limited	4829819	10 Upper Bank Street, Canary Wharf,London, United Kingdom E14 5NP, United Kingdom
Mastercard/Europay U.K. Limited	2398979	10 Upper Bank Street, Canary Wharf,London, United Kingdom E14 5NP, United Kingdom

	SessionM UK, Ltd.	10104186	10 Upper Bank Street, Canary Wharf, London, United Kingdom E14 5NP, United Kingdom
	Traina Interactive LTD	11033652	11th Floor, Whitefriars Lewins Mead, Bristol, United Kingdom BS1 2NT, United Kingdom
<b>FOR NORTH AMERICA:</b>			
<b>Country</b>	<b>Mastercard BCRs Entity</b>	<b>Registration number</b>	<b>Contact Details</b>
Canada	Mastercard Technologies Canada ULC	1146475	475 Howe Street, Vancouver, British Columbia V6C 2B3, Canada
	Ethoca Technologies Inc.	2087762	100 Sheppard Ave. East, Suite 605, Toronto, ON M2N 6N5, Canada
	Mastercard Canada ULC	823401195BC0001	1600-925 West Georgia Street, Vancouver, British Columbia V6C 3L2, Canada
	MC MAPLE ACQUISITION ULC	BC1199328	PO Box 49290, 1000-595 Burrard Street, Vancouver, British Columbia V7X 1S8,
	Trans-Fast Canada Inc.	652549	c/o Stewart McKelvey, 44 Chipman Hill, Suite 1000, P.O. Box 7289, Stn. "A", Saint John,
	Transfast Inc.	1688924	Suite 419, 3390 Keele Street, Toronto, Ontario M3J1L6, Canada
	Trans-Fast Remittance LLC (Canada, British Columbia)	LLC0000280	44 Wall Street, New York, NY 10005, USA
United States	Mastercard International Incorporated	648928	2000 Purchase Street Purchase, NY 10577 U.S.A.
	Mastercard Technologies, LLC	3457984	2200 MasterCard Boulevard 63368-7263 O'Fallon, Mo United States
	Mastercard International Services, Inc.	3454605	2000 Purchase Street, Purchase New York 10577
	Maestro International Incorporated	2364231	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Advisors, LLC	3736123	100 Manhattanville Road, Purchase, New York 10577
	Mastercard Advisors, LLC Europe	4332162	100 Manhattanville Road, Purchase New York 10577-2509
	Mastercard Advisors, LLC APMEA	4332163	100 Manhattanville Road, Purchase, New York 10577-2509, United States
	Orbiscom Inc.	3162153	2000 Purchase Street, Purchase, Harrison, NY 10577-2509

Mastercard Mobile Transactions Solution, Inc.	59760807	2000 Purchase Street, Purchase New York 10577
Mastercard Travelers Cheque, Inc.	2197420	2000 Purchase Street, Purchase New York 10577
Applied Predictive Technologies (APT), Inc.	3146225	4250 N Fairfax Drive; 11th Floor; Arlington, Virginia 22203
APT Software Holdings, Inc.	4202357	4250 North Fairfax Drive, 11 <sup>th</sup> Floor, Arlington, Virginia, 22203, U.S.A.
Brighterion, Inc.	3176106	150 Spear Street, 10th Floor, San Francisco, California 94105
ElectraCard Services, Inc.	0101013516	116 Village Boulevard, Suite 208, Princeton, New Jersey, 08540, United States
Ethoca LLC	4723423	4211 Yonge Street, Suite 202, Toronto, Ontario M2P 2A9, Canada
Eurocard U.S.A., Inc.	0100052091	2000 Purchase Street, Delaware 19901, United States
Humanity Ventures LLC	6609893	2000 Purchase Street, Purchase, New York 10577, United States
IfOnly MX Holding LLC	6567043	2000 Purchase Street, Delaware 19901, United States
Mastercard A&M Investment Holdings, LLC	5446149	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard Africa, Inc.	3229450	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard Center for Inclusive Growth, Inc.	5483520	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard Colombia Holdings, LLC	5480411	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard Colombia Investments, LLC	5480412	2000 Purchase Street, Purchase, New York 10577-2509, United States
Mastercard Colombia Processing, LLC	5480414	2000 Purchase Street, Purchase, New York 10577-2509, United States
Mastercard Colombia Technologies, LLC	5480415	2000 Purchase Street, Purchase, New York 10577-2509, United States
Mastercard Colombia, Inc.	2477931	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard Ecuador, Inc.	4565125	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard EMEA, Inc.	2503294	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard Financing Solutions LLC	3692050	2000 Purchase Street, Purchase, New York, 10577, United States

Mastercard Incorporated	3390142	2000 Purchase Street, County: Westchester, Purchase, New York 10577-2509, United States
Mastercard International Philippines, Inc.	2753003	Room 904, Ayala Tower One & Exchange Plaza, Ayala Avenue, Makati City, Philippines 1226, Philippines
Mastercard Investment Holdings, Inc.	5005370	2000 Purchase Street, Purchase, New York 10577-2509, United States
Mastercard Latin America Holdings, Inc.	4888456	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard Mercosur, Inc.	2633468	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard Middle East, Inc	3546843	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard Partners LLC	5635607	2000 Purchase Street, Legal Department, Purchase, New York 10577-2509, United States
Mastercard Peru, Inc	3157575	2000 Purchase Street, Purchase, New York 10577-2509, United States
Mastercard Prepaid Management Services USA, Inc.	4933598	2000 Purchase Street, Purchase, New York 10577-2509, United States
Mastercard Puerto Rico, LLC	192-LLC	250 Avenida de la Constitucion, San Juan, Puerto Rico, United States
Mastercard UK, Inc.	3245417	2000 Purchase Street, Purchase, New York 10577-2509, United States
Mastercard US Holdings LLC	5619847	2000 Purchase Street, Purchase, New York 10577-2509, United States
Mastercard Venezuela, Inc.	2451848	2000 Purchase Street, Purchase, New York 10577-2509, United States
MTS Holdings, Inc.	2468513	2000 Purchase Street, Purchase, New York 10577-2509, United States
Purchase Street Holdings, LLC	6985806	2000 Purchase Street, Purchase, New York 10577, United States
Purchase Street Insurance Services, LLC	4889544	2000 Purchase Street, Purchase, New York 10577-2509, United States
Purchase Street Reinsurance, Inc.	V750630	400 Cornerstone Drive, Sute 240, Chittenden County, Williston, Vermont 05495, United States
RiskRecon, Inc.	5807551	5241 South State Street, Unit 3, Salt Lake City, UT 84107
Session M, Inc.	4861126	2 Seaport Lane, 11 <sup>th</sup> Floor, Boston, MA 02210

Session M Securities Corporation	001091193	2 Seaport Lane, Boston, Massachusetts 02210, United States
TF MC Acquisition Corp.	7319857	Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware 19801, United States
Traina Interactive Corp.	5043837	1209 Orange Street, Wilmington, Delaware 19801, United States
Transactis, Inc.	3448387	1250 Broadway, New York, NY 10001
Trans-Fast Remittance, LLC	5428620	44 Wall Street, Suite 400, New York, NY 10005
Trans-Fast Remittance Holdings LLC	4238893	Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware 19801, United States
Trans-Fast Remittance, Inc.	C3655952	44 Wall Street, Suite 400, New York, New York 10005, United States
Trans-Fast Remittance, Inc. Nevada	E0401882016-1	701 S. Carson St., Suite 200, Carson City, Nevada 89701, United States
Vyze, Inc.	4571902	2700 W. Anderson Lane, Suite 119, Austin, Texas 78757, United States

**FOR ASIA PACIFIC:**

<b>Country</b>	<b>Mastercard BCRs Entity</b>	<b>Registration number</b>	<b>Contact Details</b>
Australia	Mastercard Loyalty Solutions Australia Pty Ltd	002693656	72 Christie Street, St Leonards NSW 2065, Australia
	APT Australia Pty. Ltd.	603177171	72 Christie Street, St Leonards, NSW 2065, Australia
	Ethoca Australia Branch	ABN: 891 864 66976	100 Harbour Esplanade Docklands, Victoria 3008, Australia
	IfOnly Australia Pty Ltd.	629 248 399	Level 10, 68 Pitt Street, Sydney, Sydney NSW 2000, Australia
	Mastercard Asia/Pacific (Australia) Pty Ltd	108 603 345	72 Christie Street, St Leonards, Australia NSW 2065, Australia
	Mastercard Australia Holding Pty Ltd	143 337 722	72 Christie Street, St Leonards, NSW 2065, Australia
	Mastercard Australia Pty Ltd	168 732 429	72 Christie Street, St Leonards, NSW 2065, Australia
	Mastercard Prepaid Management Services Australia Pty Ltd	145 452 044	72 Christie Street, St. Leonards, NSW 2065, Australia



	Mastercard Travel Solutions Australia Pty Ltd	003 745 999	72 Christie Street, St Leonards, NSW 2065, Australia
	Plus Points Pty Ltd	101 890 537	72 Christie Street, St Leonards, NSW 2065, Australia
	PPS Loyalty Pty Ltd	129 013 921	72 Christie Street, St Leonards, NSW 2065, Australia
	Trans-Fast Pty, Ltd	95149710494	Units 1607-8, 16th Floor, Citicorp Centre, 18 Whitfield Road, Causeway Bay, Hong Kong, Hong Kong
Bangladesh	Bangladesh Rep Office of Trans-Fast Remittance, LLC	03.219.344.00.00 .0000.2530.0209 2019	City Centre, Level-27, Suite # 26 A1-A2, 90/1, Motijheel, C/A, GPO, Dhaka, PO: 1000
	Bangladesh Representative Office of Mastercard Singapore Holding Pte. Ltd.	03.219.344.00.00 .0000.2478.2407 2019	Crystal Place (12th Floor), SE (D) 22, Road #140, Gulshan South Avenue, Gulshan-1, Dhaka, Dhaka 1212, Bangladesh
Cambodia	Cambodia Representative Office of Mastercard Singapore Holding Pte. Ltd.	1784/2015	Canadia 18th Floors, No. 315,, Aung Doung Street Corner Monivong Blvd, Sangkat Wat Phnom, Khan Daun Penh, Phnom Penh, Cambodia, Cambodia
China	APT Technology Consulting (Shanghai) Co., Ltd.	91310115MA1K 3LDL5Q	Unit 1904, No. 8 Central Avenue, Pilot Free Trade Zone, Shanghai, China, China
	Beijing Branch of Mastercard Information Technology (Shanghai) Co., Ltd	11000045026046 8	B1207, NO.26, Chaowai Street, Chaoyang District, Beijing, China, China
	China Branch (Beijing) of Mastercard Shanghai Business Consulting Co., Ltd.	91110101569494 4632	Room 501A, 5th Floor, China Resources Building, No. 8 Jianguomenbei Avenue, Dongcheng District, Beijing 10005, China
	China Branch (Guangzhou) of Mastercard Shanghai Business Consulting Co. Ltd.	91440101569751 351Q	Room 2015-16A, CITIC Plaza, No. 233 Tianhe North Road, Guangzhou, Guangzhou, Guangzhou 510613, China
	China Representative Office (Beijing) of Mastercard International Incorporated	91110000X0000 04579	No. 8 Janguomen Wei Ave., China Resources Building, Room 701-702, Beijing, China 100005, China
	China Representative Office (Guangzhou) of Mastercard International Incorporated	91440101781210 958N	Room 2015-16A, CITIC Plaza, No. 233 Tian He North Road, Guangzhou, Guangzhou 510613, China



	Mastercard Information Technology (Shanghai) Co., Ltd.	[2010]0192	Suite 739, No 718, Guangming Road, Pudong New District, Shanghai, China, China
	Mastercard Netsunion Information Technology (Beijing) Co, Ltd.	91110102MA01 HHL193	Room 111, No. 101 Building 3, Beishanhuan Middle Road No. 29, Xicheng District, Beijing, China, China
	Mastercard Shanghai Business Consulting Ltd.	91310000671165 72XD	Room 2907-14, 29/F, Shanghai IFC, 8 Century Avenue, Pudong, Shanghai, China 200120, China
	Pinpoint Market Information Consulting (Shanghai) Co Ltd	[2007]0448	Room 1206-B12, NO. 333, Middle Huaihai Road, Huangpu District, Shanghai, China, China
	Pudong Branch of Mastercard Information Technology (Shanghai)	31011550013061 8	Room 04, 40/F, One Lujiazui   No.68, Middle Yincheng Road, Shanghai, China, China
Hong Kong	Mastercard Asia/Pacific (Hong Kong) Limited	893425	Suite 1801-03, 18/F Central Plaza, 18 Harbour Road, Wanchai, Hong Kong, Hong Kong
	Mastercard Loyalty Solutions China Limited	1337732	Unit 1001, 10/F., Infinitus Plaza, 199 Voeux Road, Central, Hong Kong, Hong Kong
	Mastercard Loyalty Solutions Hong Kong Limited	753228	Unit 1001, 10/F., Infinitus Plaza, 199 Voeux Road, Central, Hong Kong, Hong Kong
	Mastercard Loyalty Solutions International Limited	708782	Unit 1001, 10/F., Infinitus Plaza, 199 Voeux Road, Central, Hong Kong, Hong Kong
	Mastercard Travel Solutions Hong Kong Limited	1571209	Room No. 3512, 35/F, Central Plaza, 18 Harbour Road, Wanchai, Hong Kong, Hong Kong
	New York Bay (Hong Kong) Ltd	2213306	Units 1607-8, 16th Floor, Citicorp Centre, 18 Whitfield Road, Causeway Bay, Hong Kong
India	Mastercard India Services Private Limited	U93000HR201 2FTC047951	4 <sup>th</sup> Floor, DLF Plaza Tower, DLF Phase 1, Gurgaon – 122 002, India
	Mastercard Technology Private Limited, India	892.2	Business Bay, 10th Floor, Tower A, Wing 1 Survey No. 103, Opp. Poona Club Golf Course Airport Road, Yerwada, Pune – 411 006, India
	Mastercard Mobile Transactions Solutions Private Limited	046802	Business Bay, 4th Floor, Tower A, Wing 1 Survey No. 103, Opp. Poona Club Golf Course Airport Road, Yerwada, Pune – 411 006, India

	Mastercard Loyalty Solutions India Private Limited	U74900MH209P TC190903	602-603, Windfall, Sahar Plaza, J B Nagar, Andheri-Kurla Road Mumbai, Maharashtra, 400 059 India
	India Branch (Gurgaon) of MasterCard Advisors, LLC APMEA	83.050.2012.13	5th Floor, DLF Plaza Tower, DLF Phase 1, Gurgaon, Haryana 122002 (PIN, India
	India Rep Office of Mastercard International Incorporated	NDL092000069	61-A, 2 North Ave, 4th Fl, Maker Maxity, Bandra, Kurla Complex, Mumbai, Mumbai 400051, India
	Transfast Financial Services Private Ltd	U67190PB1995 PTC015897	Lower Ground Floor, Office No. 6, City Square EH-197, Civil Lines, Jalandhar PB, India 144001, India
	Trans-Fast India Private Limited	U67190MH201 0FTC206754	C-201, Kailas Esplanade, LBD Marg, Ghatkopar West, Mumbai, Maharashtra 400086, India
	Trans-Fast Remittance LLC (India) (Liaison Office)	F06275	6th Floor, K.G Oxford Business Centre, Sreekanath Road, Ravipuram, Kochi, Kerala, India, 682016
Indonesia	PT Mastercard Indonesia	09.05.1.70.6800 08	Sentral Senayan 1, Lt. 17/117 E, JL., Asia Afrika No. 8, Central Jakarta, Indonesia, Indonesia
Japan	APT Japan G.K.	0104-03-01088	CERULEAN TOWER 16F 26-1 Sakuragaoka-cho Shibuya-ku, Tokyo 150-0031 Japan
	Japan Branch of Mastercard Loyalty Solutions International Limited	708782	Unit 1001, 10/F., Infinitus Plaza, 199 Des Voeux Road Central, Central Hong Kong Japan
	Mastercard Japan K.K.	0110-01- 051453	Cerulean Tower 16F, 26-1 Sakuragaoka-cho, Shibuya-ku, Tokyo, Japan 150-8512, Japan
	Mastercard Prepaid Management Services Japan KK	0110-01- 069577	Cerulean Tower, 16th Floor, 26-1 sakuragaoka-cho, shibuya-ku, Tokyo 100-8133, Japan
	Mastercard Services Japan Limited	0110-03- 006898	Cerulean Tower 16th Floor, 26-1, Sakuragaoka-cho, Shibuya-ku, Tokyo, Japan 150-8512, Japan
	Trans-Fast Japan Company Limited	0111-01- 074059	Shinjuku Ku, Tokyo, Japan, Japan
Malaysia	Malaysia Branch of Mastercard Asia/Pacific Pte. Ltd.	200402000010	43-2, Plaza Damansara, Jalan Medan Setia 1,, Bukit Damansara, Kuala Lumpur, Malaysia 50490, Malaysia
	Trans-Fast Payment Solutions SDN BHD	1220440-D	Level 1, No.11, Jalan PJU 1A/41B, NZX Commercial centre, Ara Jaya, Selangor, Petaling Jaya Malaysia

New Zealand	Mastercard Loyalty Solutions New Zealand Limited	229 8309	Martelli McKegg, Level 20, PwC Tower, 188 Quay Street, Auckland, New Zealand 1010, New Zealand
	Mastercard New Zealand Limited	1893982	C/- Martelli McKegg, Level 20, PwC Tower, 188 Quay Street, Auckland, New Zealand 1141, New Zealand
	Mastercard Prepaid Management Services (NZ) Limited	3261147	Level 3, MasterCard House, 136 Customs Street, West Auckland, New Zealand 1010, New Zealand
Philippines	New York Bay Philippines, Inc.	182094	Unit 2-7 Level 18 IBP Tower, Dona Julia Vargas Avenue, Ortigas Center, Pasig City, Philippines, Philippines
	Philippines Branch of Mastercard International Philippines, Inc.	A199915970	27/F Unit D, Tower One and Exchange Plaza, Ayala Triangle, Ayala Avenue, Makati City, Manila, Philippines 1226, Philippines
	Philippines Branch of Mastercard Singapore Holding Pte. Ltd.	FS201222408	Units 903 & 904 - 9th Floor, Tower One, Ayala Triangle, Ayala Avenue, Makati City, Philippines, Philippines
Singapore	Mastercard Asia/Pacific Pte. Ltd, Singapore	199306324E	3 Fraser Street DUO Tower, Level 17, Singapore 189352
	Access Prepaid Singapore Pte. Ltd.	201105746G	10 Changi Business Park, Central 2; #05-01, HansaPoint@CBP, Singapore 486030, Singapore
	Mastercard AP Financing Pte. Ltd.	201731499K	3 Fraser Street, #17-21/28, Duo Tower, Singapore, Singapore 189352, Singapore
	Mastercard Labs Kenya Holdings Pte. Ltd.	201431144W	3 Fraser Street, DUO Tower 17-21/28, Singapore 189352, Singapore
	Mastercard Loyalty Solutions Singapore Pte. Ltd.	199302957W	10 Changi Business Park Central 2, #05-01, Hansapoint@CBP, Singapore, Singapore 486030, Singapore
	Mastercard Singapore Holding Pte. Ltd.	201008183D	152 Beach Road #35-00, The Gateway East, Singapore 189721, Singapore
	Mastercard Travel Solutions Singapore Pte. Ltd.	201309334G	10 Changi Business Park Central 2, #05-01, Singapore, Singapore 486030, Singapore
	Mastercard VocaLink Asia Pacific Pte. Ltd.	201927008N	3 Fraser street, #17-21/28, Duo Tower, Singapore, Singapore, Singapore

	Transfast Singapore Pte. Ltd	201700267K	491B River Valley Road, #15-01, Valley Point, Singapore 248373, Singapore
South Korea	Access Prepaid Korea Limited	110114-0098621	16th floor, 136, Sejongdaero, Jung-gu, (Seoul Finance Center, Taeyeongro-1ga), Seoul, Republic of Korea, Republic of Korea
	Mastercard International Korea Ltd.	113023	16F, Seoul Finance Center, 136 Sejongdaero Junggu, Seoul, Republic of Korea 100-768, Republic of Korea
Sri Lanka	Sri Lanka Rep Office of Mastercard Singapore Holding Pte. Ltd.	1263	Regus 26, East Tower, World Trade Centre, Echelon Square, Colombo, Sri Lanka
	Transfast (Private) Limited	248190	Bernards Business Park, 2nd Floor, 106 Dutugemunu Street, Kohuwala, Dehiwala, Sri Lanka
Taiwan	Taiwan Branch of Applied Predictive Technologies, Inc.	2899-4556	42F., NO.68, SEC. 5, ZHONGXIAO E. RD., XINYI DIST., TAIPEI CITY, Taiwan 11065, Taiwan
	Taiwan Branch of Mastercard Singapore Holding Pte. Ltd.	28987963	Room B and Room A1, 42 F, No. 68, Sec. 5, Zhongxiao E. Rd., Xinyi Dist., Taiwan, Taiwan 110, Taiwan
	Trans Fast Remittance LLC (Taiwan Rep Office) (Liaison Office)	3438847	6F, No. 378, Changchun Rd., Zhongshan Dist., Taipei City, Taiwan, Taiwan
Thailand	Mastercard (Thailand) Limited	105 558 076 584	1 Q House Lumpini Building, 16th Floor, Unit 1601, South Sathorn Road, Khwaeng Thungmahamek, Khet Sathorn, Bangkok, Thailand, Thailand
	Thailand Branch of Mastercard Asia/Pacific Pte. Ltd.	100 538 031 378	Q House Lumpini Building Unit 1601, 16th Fl, 1 South Sathorn Road, Kwaeng Thungmahamek, Khet Sathorn, Bangkok, Thailand
Vietnam	Vietnam Representative Office of Mastercard Asia/Pacific Pte.Ltd.	1993306324E	Ho Chi Minh City, Viet Nam, Viet Nam
<b>FOR MIDDLE EAST &amp; AFRICA:</b>			
<b>Country</b>	<b>Mastercard BCRs Entity</b>	<b>Registration Number</b>	<b>Contact Details</b>
Bahrain	Bahrain Representative Office of Mastercard Singapore Holding Pte. Ltd	103106-1	Block 316, Road 365, Building 0001, Flat/Shop 904, Manama Center, Bahrain, Bahrain

Ivory Coast	Ivory Coast Representative Office of Mastercard Singapore Holding Pte Ltd	CI-ABJ-2017-B-6983	c/o Regus Abidjan, XL Plateau Centre, 6 floor, Unit 602, Corner of Dr. Crozet St., and Boulevard de la Republique, Plateau 01 BP 2785, Abidjan, Cote D'Ivoire
Egypt	Egypt Representative Office of Mastercard Middle East, Inc.	1016	13 Al Themar St., 10th Floor, Mohadessin,Cairo, Egypt, Egypt
	Mastercard Egypt LLC	1976	Nile City Towers, North Tower, 16th Floor, 2005C Corniche El Nil, Cairo, Egypt 11221, Egypt
Ghana	Mastercard Ghana Limited	CS155212020	5TH FLOOR VIVO PLACE, CANTONMENTS, Rangoon St; P. O. BOX MB 595,Accra, Ghana, Ghana
Jordan	Mastercard Asia/Pacific Pte. Limited/Jordan	44389	Business Park Development Zone/Amman, 26 Temp, 2 Alkursi, Gh 02, Third Floor - Office No. 3, Amman, Jordan
Kenya	Mastercard East Africa Limited	CPR/2011/55650	LR No. 1870/V/72, Sanlam Towers, 4th Floor, Waiyaki way, P.O. Box 2194-00606, Nairobi, Nairobi, Kenya
	Mastercard Labs Kenya Limited	CPR/2015/174295	L.R. No 209/8257, 6th Floor, ABC Towers, ABC Place, Waiyaki Way, PO Box 40034-00100, Kenya, Kenya
Morocco	Morocco Branch of Mastercard Africa, Inc.	1811	Tour Crystal 1, 12th Floor, Boulevard Sidi Mohammed Ben Abdellah, Quartier Casablanca Marina, Casablanca, Morocco
Myanmar	Mastercard Myanmar Limited	127160295	221 Sule Pagoda Road, Level 18, Unit 18-03, Sule Sq, Kyauktada Township, Yangon, Myanmar 11181, Myanmar
Nepal	Nepal Rep office of Trans-Fast Remittance, LLC	159346	KMNP-01, Bagmati, Kathmandu
Nigeria	Mastercard Services Sub-Saharan Africa Limited	RC 1384603	7st Floor, Alliance Place, 33A Alfred Rewane Road, Ikoyi, Lagos, Nigeria, Nigeria
	Mastercard West Africa Limited	RC 889080	7th floor, Alliance place, 33A, Alfred Rewane road,Ikoyi, Lagos, Nigeria, Nigeria
	NYBER Nigeria Limited	1055739	Flat 3, block 34 Maryland Housing Estate, Maryland, Lagos State, Nigeria
	Trans-Fast Remittances Ltd.	1382856	Block 34, Maryland Housing Estate, Maryland Ikeja,Lagos Nigeria

Pakistan	Mastercard Pakistan (Private) Limited	0098089	Care of M/s Surridge & Beecheno, 3rd Floor, Finlay House, I.I. Chundrigar Road, Karachi, Pakistan
	Pakistan Rep office of Trans-Fast Remittance, LLC	13282856	Office No. 202, Plot No.19-A/6, Business Centre, P.E.C.H.S, Main Shahrah-e-Faisal, Karachi East Jamshed Town, Pakistan
Qatar	Mastercard Gulf LLC	QFC No. 00160	Al Fardan Office Tower, Office No. 2, 16th Floor, AlFardan Office Towers, West Bay, P.O. Box 21491, Doha, Qatar,
Saudi Arabia	Saudi Arabia Branch of Mastercard Middle East, Inc.	1010192854	King Fahad Road, Al-Olaya Dist. Hamad Tower, Unit 301, P.O. Box 66749, Riyadh, Saudi Arabia 12212, Saudi Arabia
	Trans-Fast Remittance LLC (Saudi Arabia) (Branch)	10210390379846	Al-Faisaliah Tower, King Fahd Road, 11596,Riyadh, Saudi Arabia P.O. 67147, Saudi Arabia
Senegal	Mastercard Dakar Bureau de Representation	201008183D	SIA Building, 1st Floor, Route de Ngor,Les Almadies, Dakar Senegal
	Trans-Fast SAU	SN-DKR-2009-B-20224	Lot 30-C1, Sotrac Mermoz,Dakar, Senegal, Senegal
South Africa	Mastercard Payment Gateway Services PTY Limited, South Africa	2004/018042/07	2nd Floor, 23 Melrose Boulevard, Merlose Arch, Melrose North, Gauteng, South Africa 2196, South Africa
	5one Marketing SA Pty Ltd, South Africa	20007/035413/07	Regent Square, Cnr Doncaster Road & Rosmead Avenue, Kenilworth, 7708, South Africa
	Mastercard Southern Africa (Pty) Ltd	2011/006482/07	2nd Floor, 23 Melrose Arch Boulevard, Melrose Arch, JOHANNESBURG, South Africa 2196, South Africa
	South Africa Branch of Mastercard Africa, Inc.	2001/004445/10	2nd Floor, 23 Melrose Arch Boulevard, Melrose Arch, JOHANNESBURG, South Africa 2196, South Africa
	South Africa Branch of Mastercard Prepaid Management Services	2011/011898/10	7 West Street,Houghton, South Africa 2041, South Africa
	Trans-Fast South Africa, Pty Ltd.	K2017147418/07	SN-DKR-2009-B-20224
United Arab Emirates	Mastercard Middle East Africa FZ-LLC	20564	204-214, 2nd Floor, Building 04, Dubai, Dubai, United Arab Emirates
	Trans-Fast International FZ LLC	20624	2303, Aurora Tower, Next to Media One Hotel, Dubai Media City, Dubai, Dubai, United Arab Emirates

	Trans-Fast Remittance, LLC (UAE)	11179	Leased Office Bldg Office No. 22G21, 22, 24, Hamriyah Free Zone – Sharjah, United Arab Emirates, United Arab Emirates
Zimbabwe	Mastercard Zimbabwe (Private) Limited	13377/2019	24 Lanark Road, Belgravia/Avondale, Harare, Zimbabwe, Zimbabwe
<b>FOR LATIN AMERICA</b>			
<b>Country</b>	<b>Mastercard BCRs Entity</b>	<b>Registration Number</b>	<b>Contact Details</b>
Argentina	Argentina Branch of Mastercard Mercosur, Inc	30-689904390	Olga Cossettini, #771 2nd Floor, Buenos Aires, Argentina C1107CDA, Argentina
	Mastercard Cono Sur S.R.L.	1776014	Edificio Porteno 1, Olga Cossentini 771 2nd Floor, Buenos Aires, Argentina C1107CDA, Argentina
Brazil	Access Prepaid Brasil Servicos de Cartoes S.A.	35.300.389.859	Bernadino de Campos 318, 6° andar, Brooklin, Sao Paulo, Brazil CEP 04621-0, Brazil
	Brasil Branch of Mastercard Brasil Solucoes de Pagamento Ltda.	05.577.343/000 2-18	SH/SUL Quadra 06, Conjunto A, Bloco 6, Sala 611, Centro Empresarial Brasil 21, Brasilia, Brazil 70.316-000, Brazil
	Mastercard Brasil Ltda.	CNPJ/MF 01.248.201/000 1/75	Centro Empresarial Nacoes Unidas, Av. Das Nacoes Unidas 14.171, 20th Andar, Torre C - Crystal Tower, Sao Paulo, Brazil 0479-000, Brazil
	Mastercard Brasil Participacoes Ltda.	23.529.362/000 1-70	Avenida das Nações Unidas, 14.171, Crystal Tower, 19° andar, São Paulo, Brazil 04794-000, Brazil
	Mastercard Brasil Soluções de Pagamento Ltda.	05.577.343/000 2-18	Condomínio Rochaverá, Av. Das Nacoes Unidas 14.171. 20th Andar, Torre C - Crystal Tower, Sao Paulo, Brazil 04794-000, Brazil
	Zargoje Participações Ltda.	21.793.694/000 1-31	Nações Unidas Av., 14.171, 20o floor, Crystal Tower, São Paulo/SP, Brazil 04794-000, Brazil
Chile	Chile Representative Office of Mastercard International Incorporated	3998/93	Apoquindo 2929, Piso 21, Las Condes, Santiago, Chile, Chile
	Mastercard International Incorporated Chile Limitada	17658	Apoquindo 2929, Piso 21, Las Condes, Santiago, Chile, Chile
Colombia	Colombia Branch of Mastercard Colombia, Inc.	640275	Santa Fe, Bogota, Colombia, Colombia



	Mastercard Colombia Administradora S.A.	02735104	Carrera 11 No. 84-09 Entrada Norte, Piso 8 Oficina 801, Bogota, Colombia, Colombia
Costa Rica	Mastercard Costa Rica Billing Services S.R.L.	3-102-689914	Sexto Piso De Torre Lexus, Oficina Numero Ae, Sobre La Calle Marginal, De La Ruta Nacional Numero Veintisiete, San Jose-Escazu San Rafael, Costa Rica, Costa Rica
	Mastercard Costa Rica, S.R.L	3-102-607815	Torre Lexus, Piso 6, Avenida Escazú, San Rafael de Escazú, San Jose, Costa Rica, Costa Rica
Dominican Republic	Mastercard Republica Dominicana, SRL	1-31-36908-1	Rafael Augusto Sanchez No. 86, Torre Empresarial: Roble corporate center, Piso 7, Piantini, Santo Domingo, Santo Domingo, Dominican Republic
Ecuador	Ecuador Branch of Mastercard Ecuador, Inc.	1792163846001	Av. 6 de Diciembre y Luis Cordero, Edif. Novus, Ofic. 401, Quito Ecuador
Guatemala	Mastercard Guatemala Servicios Limitada	129858, Folio 569, Libro 223	Tercera Avenida 13-78 Zona 10, Octavo Nivel Citibank Tower, Guatemala, Guatemala
Jamaica	Jamaica Branch Office of Mastercard Latin America Holdings, Inc.	1943 (Overseas)	Panjam building, Ninth floor, 60 Knutsford boulevard, Kingston 5, Kingston, Jamaica, Jamaica
Mexico	IfOnly Mexico S.A.P. I de CV	551276-1	Av. Paseo de la Reforma No. 250, Torre A Piso 22, Col. Juárez, Del Cuauhtémoc, Mexico 06600, CDMX, Mexico
	Mastercard Mexico Billing Services, S. de R.L. de C.V.	492297	Av. Paseo de la Reforma No. 250, Torre A Piso 22, Col. Juárez, Del Cuauhtémoc, Mexico 06600, Mexico
	Mastercard Mexico, S. de R.L. de C. V.	332409-BIS	Av. Paseo de la Reforma No. 250, Torre A Piso 22, Col. Juárez, Del Cuauhtémoc, Mexico 06600, Mexico
	Mexico Representative Office of Mastercard International Incorporated	N/a	Av. Paseo de la Reforma No. 250, Torre A Piso 22, Col. Juárez, Del Cuauhtémoc, 06600, Mexico 06600, Mexico
	TF Mexico Soluciones S. de R.L. of C.V.	Money Trasmmitter License: 22189	Av. Las Americas 187, 1 Las Americas Morelia, Morelia Michoacan, CP 58270, Mexico
	TF Remittance SA de C.V.	17563	Av. Las Americas 187, 1 Las Americas Morelia, Morelia Michoacan, CP 58270, Mexico
	Mastercard Panama S. de R.L.	929481	SUCRE & ARIAS & REYES, 48th Street East Bella Vista, Sucre Building, Panama City, Panama, Panama

Peru	Peru Branch of Mastercard Peru, Inc.	11175092	Avenida El Derby 055, Torre 1, 5th Floor, Oficina 501, Edificio Cronos, Santiago de Surco, Lima, Peru 27, Peru
Uruguay	Mastercard Uruguay Limitada	22353	Mantua # 6706, Office 005, Montevideo, Uruguay, Uruguay
Venezuela	Venezuela Branch of Mastercard Spain Holdings, S.L.	221-38685	Banco Occidental de Descuento, Piso 2, Oficinas 2 C and 2D, Urbanizacion El Rosal, Avenida, Venezuela, Venezuela
	Venezuela Branch of Mastercard Venezuela, Inc.	16, vol. 57-A-4th	Torre Banco Occidental de Descuento,, Piso 2, Oficina 2-CD,, Urb. El Rosal, Caracas, Venezuela 1060, Venezuela

The Privacy & Data Protection Team will assess on a case-by-case basis the data transfer practices of any newly acquired companies that have not yet signed Mastercard's Intra-group Agreement and implement appropriate interim data transfer solutions, including contractual guarantees.

## Appendix 2 Glossary

**Account Servicing Payment Services Provider ('ASPSP')** – means the entity that provides a payment account for the PSU and which permit payments initiated by TPPs and/or make the PSU's account transaction data available to TPPs.

**Data Controller** – means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the Processing of Personal Information.

**Data Processor** – means the natural or legal person, public authority, agency or any other body which processes Personal Information on behalf of and under the instructions of the Data Controller.

**Data Protection Authority or DPA** – means the independent public authority supervising compliance with privacy and data protection legislation.

**Employee** – means past, present and prospective employees, consultants, temporary workers, independent contractors, directors or officers employed or hired by Mastercard.

**EEA** – means the European Economic Area, comprised of the EU Member States plus Iceland, Liechtenstein and Norway.

**EU Data Protection Law** – means: (1) the GDPR and the e-Privacy Directive 2002/58/EC (as amended by Directive 2009/136/EC) and their national implementing legislations; (2) the Swiss Federal Data Protection Act; (3) the Monaco Data Protection Act; (4) the Data Protection Acts of the EEA countries (all the above as amended and replaced from time to time).

**Europe** – means the EU Member States, EEA countries, Switzerland and Monaco.

**GDPR** – means the EU General Data Protection Regulation 2016/679 (as amended and replaced from time to time).

**Individual** – means an identified or identifiable natural or legal person (to the extent a legal person is subject to national data protection law) to whom the Personal Information pertains.

**Intra-group Agreement** – means the intra-group agreement that binds Mastercard BCR Entities to the BCRs.

**Mastercard** – means the Mastercard Group composed of Mastercard International Incorporated, Mastercard Europe SA, their subsidiaries and affiliates.

**Mastercard BCRs Entity(ies)** – means the Mastercard entities that are bound by the BCRs and have duly executed the Intra-group Agreement (listed in Appendix 1).

**Mastercard Rules** – the Rules for the Mastercard, Maestro and Cirrus brands, as available at [http://www.mastercard.com/us/merchant/pdf/BM-Entire\\_Manual\\_public.pdf](http://www.mastercard.com/us/merchant/pdf/BM-Entire_Manual_public.pdf).

**Mastercard Staff** – Employees, consultants, temporary workers, independent contractors, directors or officers employed or hired by Mastercard and who are bound by the BCRs.

**Personal Data Breach** – means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Information transmitted, stored or otherwise processed.

**Personal Information** – means any information relating to an identified or identifiable natural or legal person (to the extent a legal person is subject to national data protection law), an identifiable natural or legal person is one who can be identified, directly or indirectly, in particular by reference to an identification number (such as the personal account number) or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity

**Processing** – means any operation or set of operations which is performed on Personal Information or on sets of Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Payment Services User ('PSU')** – means the legal or natural person making use of an Open Banking payment service as a payee, payer or both.

**Sensitive Data** – means any Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data or biometric data processed for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation, as well as any other type of data that will be considered to be sensitive according to any future revision of EU Data Protection Law.

**Sub-Processor** – means the entity engaged by the Data Processor or any further sub-contractor to process Personal Information on behalf of and under the instructions of the Data Controller.

**Third Party Provider ('TPP')** – means the legal or natural person that provides account initiation services or payment initiation services to a PSU.

# **Mastercard UK Binding Corporate Rules**

**Approved on 7 March 2022**

**External Version**

**Mastercard UK Binding Corporate Rules  
External Version**

**Contents**

<b>I.</b>	Summary .....	54
<b>II.</b>	Duty To Respect The UK BCRs.....	56
<b>III.</b>	What Do Our UK BCRs Cover?.....	56
	1. Geographical Scope .....	56
	2. Material Scope .....	57
<b>IV.</b>	How Do We Protect Personal Information? .....	63
	1. Transparency & Fairness .....	64
	2. Legal Ground For Processing .....	64
	3. Sensitive Data .....	65
	4. Data Quality .....	65
	5. Purpose Limitation.....	66
	6. Rights Of Individuals.....	67
	7. Automated Decision Making .....	67
	8. Data Security.....	68
	9. Onward Transfers .....	69
	A. Onward Transfers To Data Controllers And Data Processors.....	69
	B. Onward Transfers To Sub-Processors .....	71
	10. Accountability.....	71
<b>V.</b>	How Do We Ensure Privacy Compliance?.....	72
	1. The Mastercard Privacy & Data Protection Team .....	72
	2. Senior Executive Oversight .....	73
	3. Data Protection Officer .....	73
	4. Privacy and Information Security Officers .....	73
	5. Training & Awareness .....	74
	6. Control & Audit .....	74
<b>VI.</b>	Liability .....	75
	1. Responsibility Of Mastercard UK BCR Entities .....	75
	2. Third Party Beneficiary Rights .....	75
	3. Burden Of Proof.....	77
<b>VII.</b>	Updates To The UK BCRs .....	77
<b>VIII.</b>	How Can You Lodge A Complaint And Enforce The UK BCRs?.....	77
	1. Internal Complaint Handling .....	77
	2. Redress for Individuals .....	78
	3. Duty of Cooperation .....	78
<b>IX.</b>	How Do We Handle Potential Conflicts Of Law?.....	79
Appendix 1	Mastercard Entities Covered By The UK BCRs .....	80
Appendix 2	Glossary .....	100

## I. Summary

Mastercard is a technology company in the global payments industry that connects Individuals, financial institutions, merchants, governments, public sector bodies, and businesses worldwide. We facilitate the processing of payment transactions permitting Mastercard cardholders to use their cards and other payment technologies at millions of merchants and allowing Individuals, financial institutions, businesses, public sector bodies and businesses to complete payments among themselves. Our network provides Individuals and businesses with a quick, convenient and secure payment method that is accepted worldwide. Our mission is to make payments safe, simple and smart.

To support that mission Mastercard has established a comprehensive privacy and data protection program. We dedicate significant global resources to ensure compliance with applicable data protection laws and we have embedded privacy and data protection into the design of our products and services.

We take privacy and data protection seriously at Mastercard. We have a dedicated Privacy & Data Protection Team that is led by our Chief Privacy Officer who reports to our General Counsel. Our General Counsel is a member of Mastercard's Management Committee who reports to Mastercard's Chief Executive Officer.

Mastercard conducts the following types of data Processing activities:

- **Payment processing.** As a processor of payment transactions, Mastercard obtains and processes Personal Information about cardholders and other Individuals from customers (e.g., issuing financial institutions (issuers), acquiring financial institutions (acquirers), merchants, public sector bodies, partners (e.g., digital wallets) and other businesses) to facilitate payment transactions;
- **Direct-to-consumer services.** Mastercard collects and processes Personal Information of Individuals (e.g., name, email, telephone number, type of payment card) to provide services and programs directly to them, such as loyalty and rewards programs, digital wallets, cardholder services, marketing programs and promotions;
- **Open Banking services.** Mastercard provides connectivity services between and on behalf of Account Servicing Payment Service Providers ("ASPSPs") and Third Party Providers ("TPPs"), as well as fraud prevention and dispute resolution services for Open Banking transactions.
- **Customer management.** Mastercard collects and processes Personal Information of customers, merchants, suppliers and vendors (e.g., business contact information) to contact them, to manage business relationships and to offer support services; and
- **Employee management.** Mastercard collects and processes Personal Information of Employees (e.g., name, salary, benefits, education, work experience), including information about contractors or job applicants. The information is used to manage the employment relationship and job application process.

If you are an Employee, please consult the internal version of Mastercard UK BCRs, which is available on the company's Intranet. If you are a job applicant or a former employee, our Mastercard UK BCRs apply to the processing of your Personal Information, and some of the sections applicable to our Employees may also apply to the processing of your Personal Information. These sections are only available in the internal version of our UK BCRs. We will provide you with a copy of our internal Mastercard UK BCRs upon request if you e-mail us at [BindingCorporateRules@mastercard.com](mailto:BindingCorporateRules@mastercard.com).



For our “core” payment processing activities, Mastercard acts as Data Processor on behalf of our financial institutions, merchants, customers and partners. For other activities such as programs offered directly to Individuals or employment-related activities, Mastercard acts as Data Controller. Mastercard has established a comprehensive privacy and data protection program and applies a holistic approach whether we act as Data Processor or Data Controller.

Mastercard is committed to comply with UK Data Protection Law, in particular the Data Protection Act 2018, which includes the UK GDPR and the e-Privacy Directive 2002/58/EC (as amended by Directive 2009/136/EC and replaced from time to time), as implemented into UK national legislation.

Mastercard’s UK Binding Corporate Rules (referred to as “UK BCRs” throughout the document) are part of our privacy and data protection program and are aimed at facilitating the transfer of Personal Information to and among Mastercard UK BCR entities worldwide in compliance with UK Data Protection Law. However, where the Applicable Law, for instance applicable national data protection law, requires a higher level of protection for Personal Information, it will take precedence over the UK BCRs. Regardless of the latter, the principles set out in Article 5 of the UK GDPR will always be complied with.

Our UK BCRs cover data Processing activities where we act either as Data Controller or as Data Processor. Therefore, unless otherwise specified, the rules specified in our UK BCRs apply to both types of activities. Where applicable, we specify which of the rules apply only to activities for which Mastercard is a Data Controller or a Data Processor.

At Mastercard, Personal Information is:

Processed fairly and in a transparent manner

Processed only if Mastercard can rely on a valid legal ground

Protected with additional safeguards if it is considered to be Sensitive Information

Adequate, relevant and not excessive, kept accurate and up-to-date

Processed for specified and compatible purposes, and not retained unnecessarily

Processed in accordance with Individuals' rights

Only used for automated processing in compliance with the law

Processed using operational and technical safeguards

Only processed by Processors if adequate protections exist

Mastercard Europe Services Limited, 10 Upper Bank Street, Canary Wharf, London, E14 5NP, United Kingdom, is the entity responsible for compliance with the UK BCRs in the UK. Mastercard Europe Services Limited accepts liability for any breach of the UK BCRs caused by another Mastercard entity located outside of Europe, including any Data Processor or Sub-Processor used by Mastercard. The Data Protection Authority competent for the supervision of Mastercard Europe Services Limited is the Information Commissioner (“ICO”).

In addition, Mastercard is subject to UK banking regulations and the oversight of the Payments Systems Regulator. The UK BCRs requirements are without prejudice to any separation of payment card scheme and processing entities required under Regulation (EU) 2015/751 of the European Parliament and of the Council of 29 April 2015 on interchange fees for card-based

payment transactions (as amended by the Interchange Fee (Amendment) (EU Exit) Regulations 2019), and to Mastercard's obligations under Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market as transposed and implemented in the UK by the Payment Services Regulations 2017 and the Electronic Money, Payment Services and Payment Systems (Amendment and Transitional Powers) (EU Exit) Regulations 2018, as amended from time to time.

All Mastercard UK BCR Entities are bound to comply with the UK BCRs requirements by an Intra-group Agreement. The Privacy & Data Protection Team will ensure compliance with the UK BCRs under Senior Executive oversight as well as internal and external reviews and audits.

Individuals have the right to lodge a complaint with the ICO if they believe that the UK BCRs have been breached.

Please refer to Glossary for capitalized terms used in this document.

## **II. Duty To Respect The UK BCRs**

The UK BCRs set the standards that Mastercard satisfies when processing Personal Information about Individuals either as a Data Controller or as a Data Processor.

Mastercard's UK BCRs are binding on all Mastercard UK BCRs Entities and on all Mastercard Staff Processing Personal Information as follows:

- The Mastercard UK BCRs Entities are bound by an Intra-group Agreement to respect the UK BCRs. The Mastercard UK BCR Entities that are covered by the UK BCRs and have signed Mastercard's Intra-group Agreement are listed in **Appendix 1**.
- The Mastercard Staff are bound by the UK BCRs in two ways. First, the Mastercard Staff are required to sign a binding employment contract, which requires employees to comply with the Code of Conduct, all Mastercard policies, and a duty not to disclose or misuse Personal Information. In addition, the Mastercard Staff is required to sign a declaration that they abide by the Code of Conduct and recertify adherence to the Code of Conduct on an annual basis. Adherence to the Code of Conduct requires adherence to all Mastercard's policies, including Mastercard UK BCRs.

## **III. What Do Our UK BCRs Cover?**

Mastercard's UK BCRs apply to all Mastercard UK BCRs Entities that process Personal Information either as Data Controller or as Data Processor. Therefore, unless otherwise specified, the rules of our UK BCRs apply to both types of Processing activities. Where applicable, we specify which of the rules apply only to activities for which Mastercard is a Data Controller or a Data Processor.

### **3. Geographical Scope**

Our UK BCRs cover all Processing of Personal Information, which is or was subject to UK Data Protection Law, and is conducted by Mastercard UK BCRs Entities worldwide, including the Processing of Personal Information that is transferred and processed by a Mastercard UK BCRs Entity outside of the UK and the Processing of Personal Information that was subject to UK Data Protection Law and is onward transferred from a country outside of the UK. Our UK BCRs apply to all Mastercard UK BCRs Entities worldwide; a list of countries where Personal Information may be transferred is attached in Appendix 1.

#### 4. Material Scope

Our UK BCRs cover the Processing of Personal Information described in this section.

Mastercard receives most of its data when it processes payment transactions; however, we receive a limited number of Personal Information to process these payment transactions. When we process payment transactions, we typically receive the following Personal Information: the personal account number, the merchant name and location, the date, time and the total amount of the transaction. Except as otherwise indicated in the chart below, we do not receive the cardholder’s name or other contact information. Nor do we receive information about the type of product or service that is purchased.

In addition to our core payment transaction processing activities, we also:

- offer some optional programs. If an Individual decides to participate (i.e., opts-in) in these optional programs, we may collect additional Personal Information such as the Individual’s name and their email address. Individuals are provided with a privacy notice for these optional programs, which describes the type of Personal Information we collect and how we process it. In most situations, Personal Information collected in the context of online marketing programs is collected directly from Individuals. We keep the Personal Information collected in the context of optional programs segregated from Personal Information processed for payment processing, unless otherwise specified in the program-specific privacy notice.
- offer debit payment and cheque processing services. When we process Personal Information for debit payment and cheque processing services, we may process additional Personal Information such as the Individual’s name, information that relates to the financial institutions (e.g., sort code), any reference in a free text field, the Individual’s signature, and in limited situations other unique identifiers.
- offer Open Banking services. When we process Personal Information either for ASPSPs and TPPs or at the request of the Payment Services User (“PSU”), we may process additional Personal Information, such as an Individual’s bank account details, the type of Open Banking service requested, and other identifiers. Where we act as a Data Controller, individuals are provided with a privacy notice specific to the Open Banking services.

In more detail, we process the following categories of Personal Information, depending on the type of services provided, whether we act as a Data Controller or a Data Processor, the purpose of the Processing and the categories of Individuals:

Mastercard’s Role	Purposes	Types of Personal Information
<b>Processor</b>	Authorizing, clearing and settling transactions on behalf of our financial institutions, merchants, customers and partners.	Personal Information of <b>cardholders and other Individuals</b> , such as: <ul style="list-style-type: none"> <li>• Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant).</li> <li>• Additional information for debit payment and cheque processing services (e.g., financial institution sort code, account number, free text reference, Individuals’ signature for cheque and other unique identifiers).</li> </ul>

Mastercard's Role	Purposes	Types of Personal Information
<b>Processor</b>	Cross-border and domestic account to account payments on behalf of our financial institutions and corporate customers	Personal Information of <b>account holders, beneficiaries and other Individuals</b> , such as: <ul style="list-style-type: none"> <li>• Data related to fund transfers (e.g., personal account number, associated codes, name and location of the payee).</li> <li>• Contact information (e.g., name, phone number) as well as other information (e.g. date of birth, government ID) when provided by financial institutions and corporate customers.</li> </ul>
<b>Processor</b>	Supporting our customers' issuing and acquiring business.	Personal Information of <b>cardholders</b> , such as: <ul style="list-style-type: none"> <li>• Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant).</li> <li>• Contact information (e.g., name, postal or email address, phone number) as well as other information (e.g. date of birth, gender, government ID) as/when provided by cardholders (for card registration purposes), issuers and acquirers.</li> <li>• Additional information provided by cardholders or merchants (e.g., delivery address, product codes).</li> </ul> Personal Information of staff at <b>financial institutions and merchants</b> , such as: <ul style="list-style-type: none"> <li>• Contact information (e.g., business email address, business postal address, business telephone number, job title).</li> <li>• Where UK Data Protection Law applies to legal entities, Personal Information includes address of merchants, merchant category (e.g., airline) and ID numbers.</li> </ul>
<b>Controller or Processor depending on activity</b>	Cardholder dispute resolution	Personal Information of <b>cardholders and other Individuals</b> , such as: <ul style="list-style-type: none"> <li>• Data necessary for cardholder dispute resolution (e.g., personal account number, cardholder contact information, merchant details, items purchased, information about the dispute, and other unique identifiers for payment and cheque processing services).</li> </ul>
<b>Controller or Processor depending on activity</b>	Connectivity and dispute resolution services as part of our Open Banking solutions	Personal Information of <b>PSUs, TPPs and other Individuals</b> , such as:

Mastercard's Role	Purposes	Types of Personal Information
		<ul style="list-style-type: none"> <li>• Account and payment data (i.e. personal account number, date/time/amount of the transaction, name and location of the payee).</li> <li>• Data necessary for Open Banking dispute resolution (e.g. account number, PSU contact information, TPP contact information, information about the dispute, and other unique identifiers for Open Banking services).</li> <li>• Open Banking request and response information (e.g., payment initiation service requests and responses, account information service requests and responses, request reference number, and response status).</li> <li>• Electronic identification data (e.g. username, password, security questions, IP address).</li> </ul> <p><b>Personal Information of staff at ASPSPs, TPPs, financial institutions and merchants, such as:</b></p> <ul style="list-style-type: none"> <li>• Contact information (e.g. business email address, business postal address, business telephone number, job title).</li> <li>• Electronic identification data (e.g. username, password, security questions, IP address).</li> </ul>
<b>Controller</b>	Accounting, auditing and billing.	<p>Personal Information data of <b>staff at financial institutions, merchants, customers and partners</b>, such as:</p> <ul style="list-style-type: none"> <li>• Contact information of persons at financial institutions, merchants, customers and partners (e.g., business email address, business postal address, business telephone number, job title).</li> <li>• Where UK Data Protection Law applies to legal entities, Personal Information includes address of merchants, merchant category (e.g., airline) and ID numbers.</li> </ul>
<b>Controller</b>	Managing customer relationships and financial reporting, including relationships with financial institutions, merchants, customers and partners.	<p>Personal Information of <b>staff at financial institutions, merchants, customers and partners</b>, such as:</p> <ul style="list-style-type: none"> <li>• Contact information of persons at financial institutions, merchants, customers and partners (e.g., business email address, business postal address, business telephone number, job title).</li> <li>• Where UK Data Protection Law applies to legal entities, Personal Information includes address of merchants, merchant category (e.g., airline) and ID numbers.</li> </ul>

Mastercard's Role	Purposes	Types of Personal Information
<b>Controller</b>	Managing suppliers and vendors.	Personal Information of <b>staff at suppliers and vendors</b> , such as: <ul style="list-style-type: none"> <li>• Contact information of persons at suppliers and vendors (e.g., business email address, business postal address, business telephone number, job title).</li> </ul>
<b>Controller</b>	Marketing activities, including offers, sweepstakes, contests and promotions.	Personal Information of <b>consumers and website users (whether or not cardholders)</b> , such as: <ul style="list-style-type: none"> <li>• Contact information (e.g., name, postal or email address, phone number).</li> <li>• Electronic identification data (e.g., username, password, security questions, IP address).</li> <li>• Data collected in the context of online marketing programs (e.g., personal characteristics, life habits, consumption habits, interests, geo-location data, and voice and image recordings).</li> </ul>
<b>Controller</b>	Compliance with Applicable Law, regulations and law enforcement requests.	Personal Information of <b>Individuals, cardholders and staff at financial institutions, merchants, customers and partners</b> , such as: <ul style="list-style-type: none"> <li>• Data required for legal compliance (e.g., know your customer information for anti-money laundering compliance, responding to Individuals' requests).</li> </ul>
<b>Controller</b>	Employment-related purposes, such as managing Mastercard's workforce, work planning, training and development, talent management, facilitating communication with and between the workforce, managing emergencies (such as ensuring business continuity and protecting health and safety), Human Resources administration (including payroll and compensation management)	Personal Information of <b>Employees and other Mastercard staff</b> , such as: <ul style="list-style-type: none"> <li>• Contact information (e.g., name, address, email address and telephone number, date and place of birth, Social Security number or other national identification number).</li> <li>• Payroll data (e.g., banking details, corporate credit card number and transaction details).</li> <li>• Information on an Individual's position (e.g., current position, title, salary plan, pay grade or level, employee ID).</li> <li>• Talent management information (e.g., application information, resume/CV, previous employment background, education history).</li> <li>• Applicant data (e.g., current and previous employers, job titles, dates of employment, resume/CV information).</li> <li>• Compensation information (e.g., base salary, bonus, benefits, pay enhancements for dependents, performance appraisals).</li> </ul>

Mastercard's Role	Purposes	Types of Personal Information
		<ul style="list-style-type: none"> <li>• Internal reports and compliance information (reports on compliance and disciplinary issues within the organization, including gift logs and, where applicable, whistleblowing reports).</li> <li>• Management records (details of any shares of common stock or directorships).</li> </ul>
<b>Controller</b>	Corporate security purposes, such as integration planning and controlling security of premises and logical systems	<ul style="list-style-type: none"> <li>• System and application data of <b>Employees and other staff</b>, as well as security control data (including any information required to access company systems and applications, information about employees' use of technology resources, and photographs and other visual images, such as CCTV images).</li> <li>• Visitor data (e.g. registration data, CCTV images).</li> </ul>
<b>Controller or Processor depending on activity</b>	Fraud, authentication, Digital Identity financial crime and risk management.	<p>Personal Information of <b>cardholders and other Individuals</b>, such as:</p> <ul style="list-style-type: none"> <li>• Fraud related payment data (e.g., personal account number, date/time/amount of the transaction, name, merchant's details and location).</li> <li>• Biometric data for authentication purposes (e.g., photographs, voice, fingerprint).</li> <li>• Online fraud and authentication data (e.g., users' device IDs, users' details, merchants' details, browser information, online behaviour, users' interactions with the device).</li> <li>• Financial crime data (e.g., data about money laundering, terrorist financing, bribery, corruption and other unlawful activities).</li> <li>• Location data.</li> <li>• Fraud score, type of fraudulent activity and confirmed fraudulent activity.</li> <li>• Additional information for debit payment and cheque processing services (e.g., financial institution sort code, account number and other unique identifiers, free text reference, Individuals' signature for cheques).</li> <li>• Any other information provided by financial institutions, corporate clients, merchants, customers and partners.</li> </ul>
<b>Controller</b>	Internal research, reporting and	Personal Information of <b>cardholders and other Individuals</b> , such as:



Mastercard's Role	Purposes	Types of Personal Information
	analysis	<ul style="list-style-type: none"> <li>Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant).</li> <li>Any other information provided by financial institutions, corporate clients, merchants, customers and partners.</li> </ul>
<b>Controller or Processor depending on activity</b>	Providing products and services directly to Individuals, including rewards programs, eWallets, and prepaid services.	<p>Personal Information of <b>cardholders</b>, such as:</p> <ul style="list-style-type: none"> <li>Loyalty and rewards data (e.g., cardholder name, e-mail address, billing or shipping address, phone number, personal account number, transaction data).</li> <li>e-Wallet registration data (e.g., cardholder name, e-mail address, billing or shipping address, personal account number, card expiration date, card verification code).</li> <li>Prepaid registration data (e.g., cardholder name, e-mail address, phone number, billing or shipping address, personal account number, card expiration date, and card verification code).</li> <li>Biometric data for authentication purposes (e.g., photographs).</li> </ul>
<b>Controller or Processor depending on activity</b>	Providing products and services directly to financial institutions, corporate clients, merchants, customers and partners, including statistical reports and tools, prepaid management services, customer service support.	<p>Personal Information of <b>staff at financial institutions, corporate clients, merchants, customers and partners</b>, such as:</p> <ul style="list-style-type: none"> <li>Contact information or identifying details of persons at financial institutions, corporate clients, merchants, customers and partners (including but not limited to business or personal email address, business or personal postal address, business or personal telephone number, job title, date of birth, country of origin, social media accounts and information, IP addresses).</li> <li>Where UK Data Protection Law applies to legal entities, Personal Information includes address of merchants, merchant category (e.g., airline) and ID numbers.</li> </ul> <p>Personal Information of <b>cardholders and other Individuals</b>, such as:</p> <ul style="list-style-type: none"> <li>Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant).</li> <li>Data received for cardholder support (e.g., data received at a call centre) or cardholder services (i.e., data to support emergency card replacement services).</li> </ul>

Mastercard's Role	Purposes	Types of Personal Information
		<ul style="list-style-type: none"> <li>Any other information provided by financial institutions, corporate clients, merchants, customers and partners.</li> </ul>
<b>Processor</b>	Providing data analytics products and services to financial institutions, merchants, corporate clients and partners with their instructions.	Personal Information of <b>cardholders and other Individuals</b> , such as: <ul style="list-style-type: none"> <li>Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant).</li> <li>Any other information provided by financial institutions, corporate clients, merchants, customers and partners.</li> </ul>
<b>Controller</b>	Anonymising data for the purposes of developing and providing data analytics products and services	Personal Information of <b>cardholders and other Individuals</b> , such as: <ul style="list-style-type: none"> <li>Transaction data (i.e., personal account number, date/time/amount of the transaction, name and location of merchant).</li> <li>Any other information provided by financial institutions, corporate clients, merchants, customers and partners.</li> </ul>
<b>Controller</b>	Establish, exercise and defend our legal rights, comply with our legal obligations, industry standards and our policies	Personal Information of <b>Individuals, cardholders and staff at financial institutions, merchants, customers and partners</b> , such as: <ul style="list-style-type: none"> <li>Data required to establish, exercise and defend our legal rights, comply with our legal obligations, industry standards and our policies.</li> </ul>

If you are an Employee, please consult the internal version of Mastercard UK BCRs, which is available on the company's Intranet. If you are a job applicant or a former employee, our Mastercard UK BCRs apply to the processing of your Personal Information, and some of the sections applicable to our Employees may also apply to the processing of your Personal Information. These sections are only available in the internal version of our UK BCRs. We will provide you with a copy of our internal Mastercard UK BCRs upon request if you e-mail us at [BindingCorporateRules@mastercard.com](mailto:BindingCorporateRules@mastercard.com).

#### IV. How Do We Protect Personal Information?

Personal Information is key to Mastercard's business activities. For our business to function we must handle Personal Information with keen sensitivity to privacy and security standards in order to protect Personal Information on behalf of all the members of our global payment network. Our company is committed to the protection of Personal Information and to compliance with relevant laws.

Mastercard first and foremost complies with UK Data Protection Law. The Mastercard UK BCRs Entities comply with UK data protection principles both when we act as a Data Controller

and where we act as a Data Processor. However, where Applicable Law requires a higher level of protection for Personal Information, it will take precedence over the UK BCRs.

- When we act as a Data Controller, we establish processes and procedures to ensure compliance with all requirements of UK Data Protection Law.
- Where we act as a Data Processor, we process Personal Information on behalf of the Data Controller and upon its instructions as provided in the Mastercard Rules or in a specific agreement between Mastercard and the Data Controller.

The following describes how we respect the principles of UK Data Protection Law, including how we cooperate with our customers to ensure respect of those principles:

## 1. Transparency & Fairness

**The Mastercard UK BCRs Entities provide Individuals with clear information on how we process Personal Information.**

Transparency is a key value at Mastercard. We provide Individuals with a number of online and offline privacy notices, including our Global Privacy Notice and program-specific privacy notices. All our privacy notices include, at the minimum, the information required by the UK GDPR (such as the identity and contact details of the controller and the Data Protection Officer, the purpose(s) of the Processing and related legal grounds, the categories data recipients, and data transfers), and a link to the UK BCRs.

Our UK BCRs inform Individuals about:

- (iv) the data protection principles we apply when processing Personal Information (Section IV),
- (v) the liability regime applicable to such Processing (Section VI);
- (vi) their third party beneficiary rights with regard to such Processing and how to exercise those rights (Section VI.2).

All Individuals have the right to easily access the UK BCRs. A public version of the UK BCRs will be published on Mastercard's public website, and Mastercard UK BCRs will be available on Mastercard's intranet.

## 2. Legal Ground For Processing

**The Mastercard UK BCRs Entities only process Personal Information if they can rely on one of the limited legal grounds provided by UK Data Protection Law.**

When a Mastercard UK BCRs Entity acts as a Data Controller, our Privacy & Data Protection Team reviews Personal Information Processing operations and ensures that the Processing is based on a legal ground for processing Personal Information, including for example:

- Individuals have unambiguously given their consent to the Processing of Personal Information;
- The Processing is necessary for the performance of a contract to which the Individual is a party or in order to take steps at the request of the Individual prior to entering into a contract;

- The Processing is necessary for compliance with a legal obligation or other regulatory obligations; or
- The Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by the third party or parties to whom Personal Information is disclosed, except where such interests are overridden by the interests or fundamental rights and freedoms of the Individual.

Where we act as Data Processor, we process Personal Information at the direction of the Data Controller who is responsible for ensuring a valid legal ground for the Processing.

### 3. Sensitive Data

**The Mastercard UK BCRs Entities only collect Sensitive Data when absolutely necessary for the purpose of the Processing and if they can rely on one of the limited legal grounds provided under UK Data Protection Law.**

Certain categories of Personal Information are Sensitive Data and receive a higher level of protection under UK Data Protection Law.

When a Mastercard UK BCRs Entity acts as a Data Controller, we process Sensitive Data only in limited circumstances, and will not process Sensitive Data unless the Processing is based on a legal ground for processing Sensitive Data, including for example:

- Individuals have given their explicit consent to the Processing;
- The Processing relates to Sensitive Data which is manifestly made public by the Individual;
- The Processing is necessary for the establishment, exercise or defence of legal claims by Mastercard;
- The Processing is necessary for the purpose of carrying out the obligations and specific rights of Mastercard in the field of employment law; or
- The Processing is necessary to protect the vital interests of the Individuals or another person where the Individual is legally or physically incapable of giving his or her consent.

### 4. Data Quality

**The Mastercard UK BCRs Entities comply with the data quality principle.**

When a Mastercard UK BCRs Entity acts as a Data Controller:

- The Mastercard UK BCRs Entities ensures that Personal Information is:
  - Kept up-to-date (data accuracy);
  - Adequate, relevant and not excessive in relation to the purpose for which the information was collected and processed (data minimization);
  - Not retained for longer than is necessary for the purpose(s) for which it was originally collected, unless legislation requires us to maintain it (limited storage periods).
- Our transaction processing system is designed to minimize the amount of Personal

Information collected and for that purpose relies primarily on the personal account number (and not on other directly identifiable information).

- We have implemented a records retention policy that sets out the appropriate time periods for which the Mastercard UK BCRs Entities will retain data, including Personal Information, in accordance with Applicable Law.

When a Mastercard UK BCRs Entity acts as a Data Processor, it will cooperate with and assist the Data Controller to comply with UK Data Protection Law, in particular it will comply with requests from the Data Controller:

- To update, correct or delete Personal Information, and will inform all Mastercard UK BCRs Entities to whom the data have been disclosed of the required update, correction or deletion of the Personal Information.
- To delete or anonymize the Personal Information as of the date when there is no justification to the retention of the data in an identified format, and will inform all Mastercard UK BCRs Entities to whom the Personal Information have been disclosed of the required deletion or anonymization of the Personal Information.

The Mastercard UK BCRs Entity acting as a Data Processor will comply with the above requests unless legislation imposed upon the Mastercard UK BCRs Entity prevents it from returning or destroying all or part of the Personal Information, in which case it will protect the confidentiality of the Personal Information and will not actively process it anymore.

## 5. Purpose Limitation

**Mastercard UK BCRs Entities only collect Personal Information for specified, explicit and legitimate purposes and do not further process it in a way incompatible with those purposes.**

When a Mastercard UK BCRs Entity acts as a Data Controller, we ensure that Personal Information is collected and processed only for specific and legitimate purposes and that it is not further processed in ways incompatible with the purposes of the collection.

One of the ways Mastercard ensures compliance with this principle is by embedding privacy and data protection standards into the product development lifecycle. As part of our product development process, the Privacy & Data Protection Team reviews the collection and use of Personal Information on a case-by-case basis to ensure that the Processing is undertaken for specific and legitimate purposes and is compatible with the purpose for which the Personal Information was collected. We embed these requirements into our technology wherever feasible to do so.

When a Mastercard UK BCRs Entity acts as a Data Processor, we comply with the following requirements:

- We only process Personal Information on behalf of the Data Controller and in compliance with its instructions, including with regard to transfers of Personal Information to a third country. If a Mastercard UK BCRs Entity cannot comply with the Data Controller's instructions, it will inform promptly the Data Controller of its inability to comply, if possible before the Processing takes place, and unless a law prohibits such notice on important grounds of public interest. Once the Data Controller is notified, it is entitled to suspend the transfer of Personal Information and/or terminate the contract.

- We take steps to return, destroy or fully anonymize the Personal Information of our customers, acting as Data Controllers, on the termination of the provision of services related to the data Processing, unless otherwise legally permitted to continue processing the data (in which case we will only process the data to the strict extent legally permitted).
- We fully cooperate with our customers to assist them in their role as Data Controllers to fulfil their data protection compliance obligations in accordance with UK Data Protection Law.
- When we use our Sub-Processors, including internal Sub-Processors, we make sure they process the Personal Information in line with the instructions of our customers acting as Data Controllers.

## 6. Rights Of Individuals

### **The Mastercard UK BCRs Entities comply with Individuals' requests to exercise their rights under UK Data Protection Law.**

When a Mastercard UK BCRs Entity acts as a Data Controller, we ensure that Individuals can exercise their right to:

- Access copies of Personal Information relating to them and receive some Personal Information in a structured, commonly used and machine-readable format to transmit it to another Data Controller;
- Obtain rectification or erasure of Personal Information relating to them or restriction of the Processing;
- Object, on grounds relating to their particular situation, to the Processing of their Personal Information;
- Object to the Processing of their Personal Information for the purpose of direct marketing.

Where we act as Data Processor, we require our customers to develop and implement appropriate procedures for handling Individuals' requests exercising their rights to access, rectify, or erase their Personal Information, restrict or object to the Processing of their Personal Information, or exercise their right to data portability. We do not reply to Individuals' requests to exercise their rights unless authorized or required to do so by our customers, but instead transmit them to our customers. We cooperate and support our customers in responding to such Individuals' requests, and have implemented technical and organizational measures for that purpose.

## 7. Automated Decision Making

### **The Mastercard UK BCRs Entities comply with the restrictions applicable to automated decisions making under UK Data Protection Law.**

When a Mastercard UK BCRs Entity acts as a Data Controller, we ensure that Individuals are not subject to a decision which produces legal effects or that similarly significantly affects them and which is based solely on automated Processing of Personal Information, including Processing intended to evaluate certain personal aspects relating to them, such as their performance at work, creditworthiness, reliability, conduct, unless the Processing is:

- Necessary for entering into or performing a contract between the Individual and Mastercard;
- Authorized by a law requiring that measures be implemented to safeguard the Individual's legitimate interests.
- Authorized by the Individual who has provided his or her explicit consent to such Processing.

When the processing is based on Individuals' consent or is necessary for entering into or performing a contract, Mastercard will implement safeguards to protect Individuals' rights, freedoms and legitimate interest, at least the right to obtain human intervention, to express his or her point of view and to contest the decision.

## 8. Data Security

**The Mastercard UK BCRs Entities implement appropriate technical and organizational measures to protect Personal Information.**

Information security is at the heart of Mastercard's business model. Mastercard continuously innovates to make electronic payments even more secure. We have introduced chip and pin technology and more recently the digitization and tokenization of payment cards on electronic devices. Mastercard and its peers developed the industry standard for the protection of payment card data (Payment Card Industry PCI data security standards) that is used globally by all parties involved in processing card transactions, including financial institutions and merchants.

Mastercard has implemented and commits to maintain a comprehensive written information security program that complies with UK Data Protection Law, as well as all other applicable privacy, data protection and information security requirements, including U.S. banking safety and security standards. Mastercard is audited for compliance with those banking security standards by U.S. banking regulators on an annual basis. In addition, Mastercard's information security program is audited by an independent third party auditor on an annual basis in accordance with established audit standards (SSAE 16).

Mastercard commits to implement state-of-the-art measures to secure Personal Information. In particular, Mastercard's information security program includes appropriate technical, physical, administrative, and organizational measures and safeguards designed to:

- Ensure the security and confidentiality of Personal Information;
- Protect against anticipated threats or hazards to the security and integrity of Personal Information;
- Protect against any actual or suspected accidental or unlawful destruction, loss, alteration, unauthorized disclosure, acquisition, use or access or any other unlawful forms of Processing of any Personal Information transmitted, stored or otherwise processed.

These measures include the following controls:

- Access controls of persons;
- Data media controls;
- Data memory controls;



- User controls;
- Personal controls;
- Access controls of data;
- Transmission controls;
- Input controls;
- Instructional controls.

For situations where a Mastercard UK BCRs Entity acts as a Data Controller, Mastercard's information security program ensures a level of security appropriate to the risks represented by the Processing and the nature of the data, as well as the state of the art and cost of implementation of those safeguards. Our program is reviewed at least annually to ensure that it is responsive to new and emerging threats to security. Where Sensitive Data is processed, Mastercard implements enhanced security measures as appropriate to the heightened risks of the Processing. We also require our Data Processors or Sub-Processors to maintain strong information security safeguards.

Where we act as Data Processor, we implement appropriate technical and organizational measures to ensure a level of security appropriate to the risks presented by the Processing in accordance with the UK GDPR, in particular:

- We and our Sub-Processors assist the Data Controller in ensuring compliance with its obligations under Articles 32 to 36 of the UK GDPR, taking into account the nature of the Processing and information available.
- We and our Sub-Processors comply with security obligations equivalent to those imposed on the Data Controller by UK Data Protection Law, in accordance with the Mastercard Rules.

In case of Personal Data Breach involving UK Personal Data, all Mastercard UK BCRs Entities will notify without undue delay Mastercard Europe Services Limited and Mastercard's Data Protection Officer, who will document the Personal Data Breach. We will notify a Personal Data Breach as follows:

- Where the Personal Data Breach is likely to result in a risk to Individuals' rights and freedoms, we will notify the ICO.
- When the Personal Data Breach is likely to result in a high risk to Individuals' rights and freedoms, we will also notify Individuals of the Personal Data Breach.
- When we act as a Data Processor, we inform the Data Controller without undue delay after becoming aware of any Personal Data Breach.

## 9. Onward Transfers

**The Mastercard UK BCRs Entities only complete onward transfers to a Data Controller, a Data Processor or a Sub-Processor in compliance with the UK BCRs and the UK GDPR requirements applicable to Data Processors and Data Transfers.**

### A. Onward Transfers To Data Controllers And Data Processors

The following section applies when Mastercard acts as a Data Controller.

The Mastercard UK BCRs Entities only communicate Personal Information to: (1) another Mastercard Data Controller in compliance with the UK BCRs, including with the transparency requirements and purpose limitation principle; and (2) a non-Mastercard Data Controller located outside of the UK if it complies with UK Data Protection Law and with the legal requirements applicable to data transfers (in particular Articles 45, 46 and 47 of the UK GDPR).

In addition, any Data Processor, including an internal Data Processor (i.e., a Mastercard UK BCRs Entity) and an external Data Processor (i.e., non-Mastercard entity or a Mastercard entity which is not bound by the Mastercard UK BCRs), who may receive or process Personal Information on behalf of a Mastercard UK BCRs Entity is subject to a rigorous due diligence process. The facts gathering and the security aspect of the diligence process is led by Third Party Risk Management (TPRM), in collaboration with the Privacy & Data Protection Team. The findings of the due diligence are reviewed by the Privacy & Data Protection Team to ensure that our Data Processors apply appropriate protections to the data and that Mastercard complies with the legal requirements applicable to Data Processors and data transfers (in particular Articles 28, 29, 32, 45, 46 and 47 of the UK GDPR). The result of the diligence process is documented in a report, which includes any required risk mitigation measures. The process is repeated on an annual basis.

In particular, the Privacy & Data Protection Team ensures that:

- Where a Mastercard UK BCRs Entity uses an internal Data Processor to process Personal Information on its behalf and under its instructions, the Processing takes place in accordance with the UK BCRs.
- Where a Mastercard UK BCRs Entity uses an external Data Processor to process Personal Information on its behalf, the external Data Processor is bound by way of a written agreement to comply with data protection obligations in accordance with Article 28 of the UK GDPR, including:
  - Process Personal Information only on behalf of and under the instructions of the Mastercard UK BCRs Entity which acts as the Data Controller;
  - Implement and maintain appropriate technical and organizational measures to protect Personal Information against unauthorized access or disclosure, including by way of a comprehensive written information security program. Having regard to the state of the art and the cost of their implementation, such measures ensure a level of security appropriate to the risks represented by the Processing and the nature of the Personal Information to be protected.
  - Inform the Mastercard UK BCRs Entity if it cannot comply with its data protection obligations, when there is a Personal Data Breach, an information security incident, or when it receives requests from Individuals or from a public authority;
  - Only transfer Personal Information outside of the UK in compliance with Articles 45, 46 and 47 of the UK GDPR;
  - Only sub-contract the Processing of Personal Information with the prior written consent of the Mastercard UK BCRs Entity which acts as the Data Controller and under an agreement that imposes on the Sub-Processor the same data protection obligations as set out in the contract between the Mastercard UK BCRs Entity and the external Data Processor;
  - Ensure that persons authorized to process the Personal Data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;

- Assist the Mastercard UK BCRs Entity to ensure compliance with its obligations pertaining to the security of the Personal Data, data protection impact assessments and related prior consultations;
- At the choice of the Mastercard UK BCRs Entity, delete or return the Personal Data to the Mastercard UK BCRs Entity after the end of the provision of the services;
- Make available to the Mastercard UK BCRs Entity information necessary to demonstrate compliance with its obligations under the agreement and inform the Mastercard UK BCRs Entity if, in its opinion, an instruction infringes UK Data Protection Law;
- Remain liable to the Data Controller for the performance of the external Data Processor's obligations.

## **B. Onward Transfers To Sub-Processors**

The following section applies when Mastercard acts as a Data Processor.

The Mastercard UK BCRs Entities only use internal Sub-Processors (i.e., a Mastercard UK BCRs Entity) or external Sub-Processors (non-Mastercard entities) in accordance with the Data Controller's instructions and the informed general or specific authorization provided in the Mastercard Rules or the specific data processing agreement between the Data Controller and the Mastercard UK BCRs Entity.

When we use external Sub-Processors, we bind them via a written agreement to ensure that they comply with the same obligations as are imposed by the Mastercard UK BCRs on Mastercard, via the Mastercard Rules or the specific agreement between the Data Controller and the Mastercard UK BCR Entity acting as Data Processor.

When the Data Controller gives a general authorization to the Mastercard UK BCRs Entity to use Sub-Processors, the Mastercard UK BCRs Entity commits to provide the Data Controller with a list of Sub-Processors and to inform the Data Controller of any addition or replacement of a Sub-Processor in a timely fashion so as to give the Data Controller an opportunity to object to the change or to terminate the contract before the Personal Information is communicated to the new Sub-Processor, except where the service cannot be provided without the involvement of a specific Sub-Processor.

In addition, Mastercard complies with the following requirements when sub-processing Personal Information:

- Our internal Sub-Processors are bound to respect our UK BCRs and only process Personal Information in line with the instructions of the Data Controllers which are specified in the Mastercard Rules or in a specific agreement.
- The Privacy & Data Protection Team ensures that Mastercard UK BCRs Entities only use Sub-Processors when appropriate data protection guarantees are implemented in accordance with Articles 28, 29, 32, 45, 46, 47 of the UK GDPR, in compliance with the Data Controller's instructions and prior authorization and the requirements outlined above for agreements with external Data Processors.

## **10. Accountability**

Where we act as Data Controller, we implement appropriate technical and organizational measures to ensure and to be able to demonstrate compliance with the UK BCRs, in particular:

- We carry out data protection impact assessments for Processing operations that are likely to result in a high risk to the rights and freedoms of Individuals and consult the ICO, where required under UK Data Protection Law.
- We implement appropriate technical and organizational measures designed to implement data protection principles and to facilitate compliance with the requirements set up by the UK BCRs (data protection by design and by default).

When we act as a Data Processor:

- We make available to the Data Controller information necessary to demonstrate compliance with its obligations and allow for and contribute to audits as provided in our UK BCRs.
- We inform the Data Controller if, in our opinion, an instruction infringes UK Data Protection Law.
- We assist the Data Controller in implementing appropriate technical and organizational measures to comply with data protection principles and facilitate compliance with the requirements set up by the UK BCRs, such as data protection by design and by default.

Whether we act as a Data Controller or a Data Processor, we maintain a record of Processing activities and make it available to the ICO upon request.

## **V. How Do We Ensure Privacy Compliance?**

The Privacy & Data Protection Team is responsible to ensure compliance with the UK BCRs requirements under senior executive oversight. Mastercard has a global team of dedicated privacy, data protection and security professionals responsible for administering our privacy and data protection programs.

Mastercard provides regular privacy and data protection training and awareness to Mastercard Staff globally, and all Mastercard Staff are required to comply with Mastercard's data protection policies and procedures. Mastercard's privacy and data protection program is subject to regular internal and external reviews and audits.

### **7. The Mastercard Privacy & Data Protection Team**

The Privacy & Data Protection Team is in charge of ensuring compliance with the UK BCRs requirement and is led by Mastercard's Chief Privacy Officer who is an Executive Vice President and reports directly to our General Counsel. Our General Counsel is a member of Mastercard's Management Committee which reports to Mastercard's Chief Executive Officer.

Mastercard ensures that the Privacy & Data Protection Team has enough human and financial resources to complete its tasks efficiently and in accordance with UK Data Protection Law. In particular, the Privacy & Data Protection Team is composed of a network of qualified data professionals as well as privacy and data protection lawyers devoting 100% of their time to privacy and data protection law. They are located in Mastercard main offices worldwide, including in the U.S., Belgium, the UK and Singapore. Senior privacy & data protection lawyers are in charge of supervising and coordinating compliance with applicable data protection rules globally. They report to Mastercard's Chief Privacy Officer and are assisted by mid-level and junior privacy and data protection lawyers. The exact structure of the Privacy & Data Protection Team is subject to change as Mastercard business evolves rapidly. An organigram of the Privacy & Data Protection Team is available upon request.

The Privacy & Data Protection Team is responsible for ensuring that the Processing of Personal

Information by the Mastercard UK BCRs Entities is legally compliant, as well as ethical. Accordingly, the team is responsible for:

- Supervising and implementing the UK BCRs;
- Ensuring compliance with the requirements of the UK BCRs;
- Updating the UK BCRs in compliance with internal governance procedures;
- Handling requests and complaints of Individuals in relation to the UK BCRs.

## **8. Senior Executive Oversight**

Mastercard's commitment to privacy starts at the highest levels of the organization, with our Board of Directors, Chief Executive Officer, General Counsel, Executive Vice President Chief Data Officer, Executive Vice President Chief Privacy Officer and our Executive Vice President Chief Security Officer. Mastercard's Chief Privacy Officer is an Executive Vice President and reports directly to our General Counsel. Our General Counsel is a member of Mastercard's Management Committee which reports to Mastercard's Chief Executive Officer.

## **9. Data Protection Officer**

Mastercard has appointed a Data Protection Officer ("DPO"), who monitors compliance with the UK BCRs and is responsible for the following tasks:

- Informing and advising Mastercard and Mastercard Staff in all matters related to the Processing of Personal Information and their obligations under UK Data Protection Law;
- Monitoring compliance with UK Data Protection Law and Mastercard's policies, including the assignment of responsibilities, awareness-raising and training of Mastercard Staff involved with the Processing of Personal Information and related audits;
- Providing advice regarding data protection impact assessments upon request;
- Acting as a contact point for Individuals in relation to all issues related to the Processing of their Personal Information and to the exercise of their rights under UK Data Protection Law;
- Cooperating with the ICO, for which he or she may act as a contact point.

The DPO has been provided with the necessary resources to carry out his or her tasks. He or she enjoys the highest management support for the fulfilment of these tasks and does not receive instructions in this regard.

## **10. Privacy and Information Security Officers**

The Privacy & Data Protection Team is supported in certain jurisdictions by data protection lawyers and information security officers. In addition, we have appointed Business Unit Records Management Champions globally, who sit in a variety of business and support functions, and who promote employee awareness about data protection, records retention and these UK BCRs. The Privacy & Data Protection Team also works closely with multiple teams around the globe, including the Corporate Security Team as well as the Information Incident Response and Records Retention teams, to ensure that our privacy and data protection program and these UK BCRs are effectively implemented.

## 11. Training & Awareness

Mastercard UK BCR Entities provide appropriate training on the UK BCRs to Mastercard Staff who have permanent or regular access to Personal Information, who are involved in the Processing of Personal Information or are involved in the development of tools used to Process Personal Information.

Mastercard's Privacy & Data Protection Team provides Mastercard Staff with engaging, relevant and up-to-date training about a variety of privacy and data-related topics, including Mastercard's policies and procedures as well as these UK BCRs. Mastercard's privacy training program is designed to provide Mastercard Staff with the knowledge, tools and resources they need to protect Personal Information and is tailored according to role, function, and access to Personal Information.

All Mastercard Staff are required to take a mandatory data protection course and the completion of the course is audited. Specialized training modules are also provided for Mastercard Staff in specific roles, functions or in specific jurisdictions. We use interactive methods to deliver training including videos, webcast programs, live fora and social activities to stress the importance of data protection and the role of our UK BCRs to all Mastercard Staff.

## 12. Control & Audit

Mastercard commits to conduct data protection audits on a regular basis or on specific request from the Privacy & Data Protection Team.

Mastercard commits to take the following actions to control compliance with UK Data Protection Law, including all the requirements of the UK BCRs, by:

- Carrying out audits for compliance on a regular basis both internally and by appointing external auditors where needed and upon request;
- Designating the internal audit team as the department responsible for carrying out internal audits every 3 years or more frequently, as appropriate, and the internal audit team and the Privacy & Data Protection Team as the department responsible to design the scope of each audit of the UK BCRs based on a risk-based approach and in relation to the particular risks presented at the time of the audit (such as the category of data processed and their sensitivity);
- Communicating the results of the audit to the internal audit team, the Data Protection Officer, the Privacy & Data Protection Team and the Mastercard Board;
- Ensuring that corrective actions take place based on the results of the audit;
- Providing customers with the result of the audit report upon request and under the strictest confidentiality obligations;
- Allowing the ICO to audit any Mastercard UK BCR Entity with UK Data Protection Law and the UK BCRs in accordance with UK law;
- Providing the ICO, with the result of the audit report upon request, and allowing the ICO to conduct an audit if and as authorized under UK law. The ICO will exercise its rights in full compliance with its confidentiality duties provided by UK law. In exceptional circumstances, Mastercard and the ICO may agree to limit the range of the concerned information and the means of communication, and to implement any additional restrictions necessary to avoid creating risks for the security, integrity and



confidentiality of Mastercard's payment network and of the global financial system;  
and

- Cooperating with the ICO with regard to any questions relating to the Processing of Personal Information by the Mastercard UK BCR Entities.

None of the above confidentiality requirements should limit the ICO's ability to issue enforcement notice, in compliance with UK law, where corrective action arising from the audit is ignored.

Where we act as Data Processor and subject to the strictest confidentiality obligations, we allow the Data Controller to request an audit of our data protection compliance program by external independent auditors, which are jointly selected by Mastercard and the Data Controller. The external independent auditor cannot be a competitor of Mastercard. Mastercard and the Data Controller will mutually agree upon the scope, timing, and duration of the audit. Mastercard will make available to the Data Controller the result of the audit of its data protection compliance program. The Data Controller must reimburse Mastercard for all expenses and costs for such an audit. In addition to the above, if the Data Controller requesting the audit is a competitor of Mastercard, Mastercard will be entitled, in cooperation with the jointly selected external auditor, to redact any commercially sensitive and confidential information from the audit report.

In addition, we bind our external Sub-Processors to: (1) provide Mastercard with the necessary information to help us verify the Sub-Processor's compliance with its data protection obligations; and (2) where necessary allow Mastercard to perform or order an on-site audit of the procedures relevant to the protection of Personal Information on behalf of our customers, acting as Data Controllers.

## **VI. Liability**

### **4. Responsibility Of Mastercard UK BCR Entities**

The Mastercard UK BCRs are enforced by all Mastercard UK BCRs entities in accordance with an Intra-Group Agreement. Each Mastercard UK BCRs Entity is responsible for complying with the UK BCRs.

In addition to the individual responsibility of Mastercard UK BCRs Entities, Mastercard Europe Services Limited accepts responsibility and agrees to:

- Take the necessary action to remedy breaches of these UK BCRs caused by other Mastercard UK BCRs Entities located outside of the UK, and contractual breaches caused by Data Processors or Sub-Processors located outside of the UK.
- Pay compensation for any material or non-material damages incurred as a result of such breaches by a Mastercard UK BCRs Entity, a Data Processor or a Sub-Processor, unless Mastercard Europe Services Limited can demonstrate that the damage could not be attributed to a Mastercard UK BCRs Entity, a Data Processor and a Sub-Processor.

Mastercard Europe Services Limited confirms that it has sufficient assets to pay compensation for damages resulting from the breach of the UK BCRs.

### **5. Third Party Beneficiary Rights**

In situations where Mastercard acts as a Data Controller, Individuals have the right to enforce the UK BCRs as third-party beneficiaries, including:



- The data protection principles and Individual's rights (Section IV);
- The right to complain through the internal complaint mechanism (Section VIII.1);
- The right to lodge a complaint with the ICO and to seek judicial remedies and to claim compensation in Courts (Section VIII.2);
- The process for handling conflicts of law (Section IX);
- The duty to cooperate with the ICO (Section VIII.3);
- This section on liability.

Therefore, if a Mastercard UK BCRs Entity violates the UK BCRs, the Courts of England and Wales, Scotland and Northern Ireland and the ICO will have jurisdiction and Individuals will have the rights and remedies against Mastercard Europe Services Limited as if Mastercard Europe Services Limited had committed the violation in the country in which Individuals are located (instead of the country of the Mastercard UK BCRs Entity outside of the UK).

When we act as Data Processor on behalf of customers, customers believing that our UK BCRs are not complied with have the right to enforce the UK BCRs against any Mastercard UK BCRs entity, including Mastercard Europe Services Limited, for breaches they caused and the right to seek a judicial remedy or claim compensation from Mastercard, including for breach of the UK BCRs caused by internal or external Sub-Processors. Moreover, customers have the right to enforce the UK BCRs against Mastercard Europe Services Limited for breach of the UK BCR or of the data processing agreement by internal or external Sub-Processors.

In addition, in situations where Mastercard acts as a Data Processor, Individuals have the right to enforce the UK BCR as third-party beneficiaries directly against Mastercard where:

- The requirements at stake are specifically directed to Data Processors in accordance with the UK GDPR, in particular the duty to (i) respect the instructions received from the Data Controller, (ii) implement appropriate technical and organizational security measures, (iii) notify any Personal Data Breach to the Data Controller, (iv) respect the conditions to engage a Sub-Processor, (v) cooperate with and assist the Data Controller in complying and demonstrating compliance with the law, (vi) provide easy access to UK BCRs, (vii) grant a right to complain through an internal complaint mechanism, (viii) cooperate with the ICO; as well as requirements pertaining to (xi) liability, compensation and jurisdiction and (x) conflicts of law.
- They are not able to bring a claim against the Data Controller because the Data Controller has factually disappeared or ceased to exist in law or has become insolvent, unless any successor has assumed the entire legal obligations of the Data Controller by contract or by operation of law, in which case the Individuals can enforce their rights against such entity. In those situations, Individuals have the right to enforce Sections II, IV.1, IV.10, VI, VIII.1, VIII.3 and IX and Appendix 1 of the UK BCRs against Mastercard Transaction Service (UK) Ltd.

In the above scenarios, Individuals are entitled to:

- Lodge a complaint before the ICO and take action against Mastercard before the Courts of England and Wales, Scotland and Northern Ireland.
- Obtain compensation and to remedy breaches of the UK BCRs. Where Mastercard, acting as a Data Controller or a Data Processor, and another third party involved in the

same Processing are found responsible for any damage caused by such Processing, Individuals are entitled to receive compensation for the entire damage directly from Mastercard and the other third party involved in the Processing.

- Obtain a copy of the public version of the UK BCRs, including its appendixes, and a copy of the Intra-Group Agreement (without any sensitive and confidential commercial information).

## **6. Burden Of Proof**

Where Individuals or customers bring a claim or proceeding for a violation of the Mastercard UK BCRs and can demonstrate that they have suffered damage and establish facts which show that it is likely that the damage occurred because of a violation of the Mastercard UK BCRs or contractual breaches caused by Data Processors or Sub-Processors located outside of the UJ, Mastercard Europe Services Limited is responsible for proving that the Mastercard UK BCRs Entity outside of the UK, the external Data Processors and Sub-Processor were not responsible for the violation giving rise to that damage or that no violation occurred. Where Mastercard Europe Services Limited is successful in proving that the Mastercard UK BCRs Entity outside of the UK, the Data Processor and the Sub-Processor are not responsible for the violation, Mastercard Europe Services Limited may discharge itself from any responsibility.

## **VII. Updates To The UK BCRs**

We may update our UK BCRs to reflect, for example, changes in our Personal Information practices, modifications of the regulatory environment or our company structure.

We commit to report any changes to our UK BCRs without undue delay to all Mastercard UK BCRs Entities and to the ICO, and where necessary, we will seek a new approval of the UK BCRs. However, in certain situations, we may update the UK BCRs, including the list of Mastercard Entities bound by the UK BCRs, without re-applying for an approval. In addition to the above, where we act as Data Processor and where a change affects the processing conditions, we will inform the Data Controller in a timely fashion so as to give the Data Controller the opportunity to object to the change or to terminate the contract before the modification is made.

## **VIII. How Can You Lodge A Complaint And Enforce The UK BCRs?**

### **4. Internal Complaint Handling**

We have implemented internal policies, processes and procedures to allow Individuals to exercise their rights and to manage complaints regarding our Personal Information practices, and these are overseen by the Privacy & Data Protection Team, Mastercard's top management and the Data Protection Officer.

In situations where Mastercard acts as a Data Controller:

- If an Individual or a customer has reasons to believe that a Mastercard UK BCRs Entity has not complied with the UK BCRs, they can lodge a complaint with the ICO or the Courts of England and Wales, Scotland and Northern Ireland or directly with Mastercard.
- To lodge a complaint with Mastercard, Individuals can proceed in the following ways:

- E-mail us at: [BindingCorporateRules@mastercard.com](mailto:BindingCorporateRules@mastercard.com) by including the term “UK BCRs” in the subject line; or
- Write to us at: Privacy & Data Protection Team, Mastercard Europe SA, Chaussée de Tervuren 198A, B-1410 Waterloo, Belgium.
- All complaints are handled by our Privacy & Data Protection Team, assisted by the Data Protection Officer, as follows:
  - We review the complaint and send an acknowledgement of receipt within ten (10) working days.
  - We then investigate the complaint and respond to it as soon as possible and within one month of receipt.
  - If the complaint is particularly complex, or given the number of complaints, Mastercard will provide an estimate of when the response will be provided to the complainant and in any event the response will be provided within three months of the receipt and will explain why it needs extra-time.
- If the complaint is upheld, Mastercard UK BCRs Entities take appropriate remedial measures as necessary to resolve the complaint and ensure compliance with the UK BCRs as appropriate.
- If an Individual is not satisfied with the response from the Privacy & Data Protection Team, that Individual can lodge a complaint with the ICO or lodge a claim with the Courts of the England and Wales, Scotland and Northern Ireland.

Where we act as Data Processor, we strongly encourage Individuals to first seek to contact the relevant Data Controller. If we receive a complaint directly from an Individual, our Privacy & Data Protection Team will review the complaint and will forward it to the relevant Data Controller, unless the Data Controller has ceased to exist or became insolvent in which case the complaint is handled by Mastercard as described above.

## **5. Redress for Individuals**

In addition to the internal complaint described above, Individuals can seek redress by: (1) lodging a complaint with the ICO; and (2) seeking a judicial remedy or claiming compensation in court. Individuals are free to lodge a complaint with the ICO, seek a judicial remedy or claim compensation in court regardless of whether they have first lodged a complaint with Mastercard.

To ensure the best possible cooperation and efficiency in relation to complaints, it is preferable that Individuals exercise their rights before the ICO or the Courts of England and Wales. However, this does not preclude them from their right to enforce the UK BCRs before the courts of the Individual’s country of residence.

When we act as Data Processor on behalf of customers, customers who believe that our UK BCRs are not complied with have the right to seek a judicial remedy or claim compensation from Mastercard, including for breach of the UK BCRs caused by internal or external Sub-Processors.

## **6. Duty of Cooperation**

Mastercard UK BCR Entities will cooperate with requests, queries or complaints from Individuals, Data Controllers and the ICO. Mastercard UK BCR Entities will follow the recommendations of the ICO regarding the implementation of the UK BCRs.

## **IX. How Do We Handle Potential Conflicts Of Law?**

Where Applicable Law is likely to prevent a Mastercard UK BCRs Entity from fulfilling its obligations under these UK BCRs and where complying with such Applicable Law is likely to have a substantial adverse effect on the guarantees provided by these UK BCRs, the matter is referred to the Privacy & Data Protection Team for resolution and as required under applicable UK law, to the ICO. Our Privacy & Data Protection Team reviews each matter on a case-by-case basis and documents it internally.

If we receive an access request for Personal Information by a law enforcement authority or state security body (“requesting agency”), the Privacy & Data Protection Team responds to the enquiry by informing the requesting agency about our limited data set. We also refer the requesting agency to the appropriate financial institution, which holds more comprehensive information about the relevant cardholder.

Where the requesting agency pursues the request, we ensure that it follows the required legal process for its country and jurisdiction, including any applicable privacy safeguards. If there is a question about the legitimacy or scope of the request, we challenge it. Only when we are satisfied that the legal process is valid and appropriate, and when we are convinced that the request does not prevent a Mastercard UK BCRs Entity from fulfilling its obligations under these UK BCRs and does not have a substantial effect on the guarantees provided by them, do we deliver the narrowest possible set of data required to be responsive to the request while ensuring data minimization.

If we do not manage to resolve the conflict of laws, the Privacy & Data Protection Team will use its best efforts to put the access request on hold for a reasonable delay in order to consult with the ICO on how to resolve it, unless otherwise prohibited by Applicable Law, such as a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation.

Transfers of Personal Data, which are not massive, disproportionate, indiscriminate and do not go beyond what is necessary in a democratic society on the basis of one of the interests listed in Article 23 of the UK GDPR are in principle not in contradiction with Mastercard UK BCRs and thus do not require consultation with the ICO. However, in case of doubt, Mastercard will consult with the ICO.

When the suspension and/or notification are prohibited, such as in case of a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation, Mastercard will use its best efforts to obtain the right to waive this prohibition in order to communicate as much information as it can and as soon as possible to the ICO, and be able to demonstrate that it did so. If despite having used its best efforts, Mastercard is not in a position to notify the ICO, it will provide general information on the requests (e.g., number of applications for disclosure, type of Personal Information requested, requesting agency if possible) to the ICO on an annual basis.

In addition to the above, where a Mastercard UK BCRs Entity acts as Data Processor, we notify the Data Controller when Applicable Laws prevent the Mastercard UK BCRs Entity (1) from fulfilling its obligations under these UK BCRs and have a substantial adverse effect on the guarantees provided by these UK BCR, and (2) from complying with the instructions received from the Data Controller via the Mastercard Rules or the data processing agreement between Mastercard and the Data Controller. We do not notify Data Controllers if such disclosure is prohibited by Applicable Law, such as a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation. The Data Controller is responsible for notifying the ICO if applicable and as authorized under Applicable Law.

## Appendix 1 Mastercard Entities Covered By The UK BCRs

Mastercard UK BCR Entities and Mastercard Staff are bound to respect the UK BCRs. At a high-level, Mastercard UK BCRs Entities are structured as follows:

- Mastercard Europe S.A., Waterloo, Belgium is the European headquarters of Mastercard.
- Mastercard International Incorporated is the global headquarters of Mastercard.
- Mastercard Europe Services Limited and all other entities are subsidiaries or affiliates of Mastercard Europe S.A., Waterloo, Belgium or Mastercard International Incorporated.

The following Mastercard UK BCR Entities have signed Mastercard's UK BCRs Intra-group Agreement:

The following list is accurate as of February 2022. For a fully updated list of entities please contact the Privacy & Data Protection Team at [BindingCorporateRules@mastercard.com](mailto:BindingCorporateRules@mastercard.com).

<b>FOR EUROPE:</b>			
<b>Country</b>	<b>Mastercard UK BCRs Entity</b>	<b>Registration number</b>	<b>Contact Details</b>
Austria	Mastercard Europe S.A. Austria Representative Office	ATU642 17378	Mastercard Europe SA Wipplingerstraße 30/DG 1010 Vienna, Austria
	IfOnly Austria GmbH	FN 50 1126	Mooslackengasse 17, Austria 1190 Wien, Austria
Azerbaijan	Mastercard Europe SA Azerbaijan Representative Office	1403433041	AZ1078, Baku City, Nasimi District, Hasan Aliyev, 4/189, Falez Plaza, 6th Floor, Azerbaijan
Belarus	Mastercard Europe SA Belarus Representative Office	527053201	4-32 Zybetskaya Str., 2nd (second) floor No: 32-1, Minsk, 220030, Belarus
Belgium	Mastercard Europe S.A.,	0448.038.446	Chaussée de Tervuren 198A B-1410, Waterloo, Belgium
	HomeSend SCRL	0549.987.927	Rue des Colonies 56, 1000 Bruxelles, Belgium
	Belgium Branch (Waterloo) of Maestro International Incorporated	0463.192.915	Chaussee de Tervuren 198A, Waterloo, 1410, Belgium
	Mastercard Jupiter Investments SPRL	0830.805.493	Chaussee de Tervuren 198A, Waterloo, 1410, Belgium
	Mobile Financial Services Holding SPRL	0829.715.729	Lxelles Avenue Louise 149/24, Brussels, 1050, Belgium
Bosnia & Herzegovina	Mastercard Europe S.A., Bosnia & Herzegovina Representative Office	4202169990006	BIH – Sarajevo 1 FRA Andela Zvizdovica Unitic Business Center, Building A, Sarajevo

Bulgaria	Mastercard Europe S.A. Bulgaria Representative Office	176381804	Boulevard Totleben, 53-55, Stolichna Municipality, Sofia BG- 1506, Bulgaria
Bulgaria	Sel Int Ltd Bulgaria EOOD	200217365	Varna 9010, District of Varna, Municipality of Varna, Primorski area, 30, Prilep, Bulgaria
Croatia	Mastercard Europe S.A. Croatia Branch Office	'080867029	Zagreb Tower Radnicka cesta 80/8 10 000 Zagreb, Croatia
Cyprus	Cyprus Rep office of Mastercard Europe SA	AE3516	Hadjikyriakeion Bld 1, 121 Prodromou Avenue, 1st floor, Nicosia 2064, Cyprus
Czech Republic	Mastercard Europe S.A. Czech Republic Branch Office	693 45 724	Palladium, Na Porici 1079/3a, 110 00 Prague 1, Czech Republic
	Session M Czech Republic s.r.o.	077 21 587	Pernerova 697/35, Karlin, 186 00 Prague 8, Prague Czech Republic
Denmark	Mastercard Europe S.A. Denmark Branch Office	37501727	Gammel Kongevej 1 Copenhagen, 1610 Denmark
	Mastercard Payment Services Denmark A/S	40695869	Arne Jacobsens Alle 13, Copenhagen S 2300, Denmark
	Aiia A/S	35509006	Artillerivej 86, ST. TV., 2300 Copenhagen, Denmark
Finland	Mastercard Europe S.A. Finland Branch Office	2751634-9	Etelaesplanadi 2, 3C/4D Krs. Helsinki, 00130 Finland
France	Mastercard France SAS, France	501573158	112, Avenue Kleber 75784 Paris Cedex 16 France
	France Branch of HomeSend SPRL	821 562 360	31 Chemin du Vieux Chene, Meylan 38240, France
Georgia	Mastercard Europe S.A. Georgia Representative Office	404552649	2 Leonidze Str./1G Tabidze Str., No. 7 Floor 5, Mtatsminda District, Tbilisi, Georgia,
Germany	Mastercard Europe S.A. Germany Representative Office	006 412 000	Unterschweinstiege 10, 60549 Frankfurt/Main Germany
Greece	Mastercard Europe S.A. Greece Representative Office	998643769	23 Vasilissis Sofias Avenue 10674 Athens, Greece
	Mastercard Europe Greece Single Member S.A.	156214201000	Vasilissis Sofias Avenue No 23, Athens, Greece 10674, Greece
Hungary	Mastercard Europe S.A. Hungary Representative Office	01-12-073361	Deak Ferenc Utca 5H – 1052 Budapest Hungary
	Mastercard Magyarország Korlátolt Felelősségű Társaság	01-09-383338	Deak Ferenc ucta 5, Budapest 1052, Hungary
	Ekata Global Hungary Kft	01-09-171264	1092 Budapest, Köztelek utca 6. 3. em., Hungary
Ireland	Ethoca Limited	412289	25/28 North Wall Quay, Dublin 1, Ireland



	Ethoca Nominees Limited	557283	25 - 28 North Wall Quay, Dublin 1, Ireland
	Eurocommerce Call Centre Solutions Limited	316850	Block C, Central Park, Dublin 18, Ireland
	Mastercard Ireland Limited	499963	MountainView, Central Park, Dublin 18, Ireland
	Orbis Patents Limited	285583	Mountain View, Central Park, Leopardstown, Dublin 18, Ireland
Israel	Mastercard Israel LTD	515837888	Aluf Kalman Magen 3, Tel Aviv, 6107075 Israel
	Trans-Fast Payment Solutions Ltd	515751741	35 Jabotinsky Street, Ramat Gan 5251108, Israel
	Finsec Lab Ltd.	516105624	Aluf Kalman Magen St. 3, Tel Aviv-Yafo 6107075, Israel
Italy	Mastercard Europe S.A. Italy Branch Office	97091560587	Piazza del Popolo 18, 1st Floor Roma, Italy - 00187
	IfOnly Italy S.R.L.	RM1558544	Roma (RM) Via Delle Quattro Fontane 15, Italy Cap 00184, Italy
Kazakhstan	Mastercard Europe S.A. Kazakhstan Representative Office	120542010604	CDC 2 Business Centre, 240v Furmanov Street, Almaty, Kazakhstan
Lebanon	Mastercard Europe S.A. Lebanon Representative Office	2975	9th Floor, Achrafieh 5585 Building, Pierre El Gemayel, Palais de Justice District, P.O. Box 11-7236, Beirut, Lebanon
Netherlands	Mastercard Europe S.A. Dutch Branch Office	50304348	Gustav Mahlerplein 105-115, 1082 MS Amsterdam, The Netherlands
	Trans-Fast International Cooperatief, UA	59274034	Prins Hendriklaan 26, Amsterdam, Netherlands 1075BD, Netherlands
	Ekata Global - Netherlands B.V.	74096397	Prins Hendrikkade 48, 1012AC Amsterdam, The Netherlands
Norway	Mastercard Europe S.A. Norway Branch Office	816 220 122	Oslo, Aker Brygge, 2nd Floor, Filipstads Brygge 1, Norway
	Mastercard Payment Services Infrastructure (Norway) AS	922988862	Haavard Martinsens vei 51, Oslo 0978, Norway
	Mastercard Payment Services Norway AS	822988822	Haavard Martinsens vei 51, Oslo 0978, Norway
Poland	Mastercard Europe S.A. Poland Branch Office, Poland	0000345959	Plac Europejski 1 Warsaw Spire, 31st Floor 00-844 Warsaw, Poland
Poland	Mastercard Processing S.A. (FKA Trevica S.A. Mastercard Payment Transaction Services S.A.)	0000316035	ul. Dziekońskiego 1, Warszawa, Poland



Portugal	Mastercard Europe S.A. Portugal Representative Office	980276500	Avenida Da Liberdade 110, 1, Lisbon Portugal
Romania	Mastercard Europe S.A. Romania Branch Office, Romania	38645357	4-8 Nicolae Titulescu Street America House Building, West Wing, 2 <sup>nd</sup> Floor, 011141 Bucharest, Romania
Russia	Mastercard Europe S.A. Russia Representative Office	NAN 20150011134 TIN	10 Bolshaya Dmitrovka Street, Building 4, Moscow, Russian Federation, Russian Federation
	Mastercard OOO	11077463239 26	10 Bolshaya Dmitrovka St., Building 4, Moscow, Russia, Russian Federation
	CEL INT, Ltd UK (Moscow, Russia Rep Office)	TIN 99- 09311962	Moscow, Bolshoi Sergievsky 10, floor 1, apt. III
Serbia	Mastercard Europe S.A., Serbia Representative Office	29026866	Milutina Milankovića 1ž, Entrance B, 5th floor, Belgrade, 11070, Serbia
Slovenia	Mastercard Europe S.A., Slovenia Branch	7203543000	Dimičeva ulica 013, Ljubljana 1000, Slovenia
Spain	Mastercard Europe S.A. Spain Branch Office	W0171837H	Paseo de la Castellana, 259 C, 11 <sup>a</sup> Torre Cristal / 28046 Madrid, Spain
	Mastercard Spain Holdings, Sociedad Limitada	M569558 Book 31651/90	Avenida de Concha Espina 39B, Madrid, 28016, Spain
Sweden	Mastercard Sweden Services AB	559089-2138	Kungsgatan 33, 4th Floor SE- 111 56 Stockholm, Sweden
Switzerland	Mastercard Europe S.A. Switzerland Branch Office	CHE- 110.335.313	Löwenstrasse 25 8001 Zürich
Turkey	Mastercard Europe S.A., Turkey Representative Office	3810044245	Tamburi Ali Efendi Sok., No: 1334337 Etiler – Istanbul
Ukraine	Mastercard Europe S.A., Ukraine Representative Office	26600463	17/52 Bogdana Khmelnytskogo street, floor 4 A, office 404 A, Kiev, 01030, Ukraine
UK	Mastercard Prepaid Management Services Limited	05429739	Access House, Cygnet Road Hampton, Peterborough, PE7 8FJ, United Kingdom
	Mastercard Payment Gateway Services Limited	03430157	10 Upper Bank Street London, E14 5NP United Kingdom
	Mastercard Payment Gateway Services Client Finance Limited	03565041	10 Upper Bank Street London, E14 5NP United Kingdom
	Mastercard Payment Gateway Services Group Limited	03168091	19th Floor, 10 Upper Bank Street, London, E14 5NP, United Kingdom
	Mastercard Track Ltd.	3603992	10 Upper Bank Street, London, E14 5NP, United Kingdom
	Applied Predictive Technologies UK Ltd	06947472	4th Floor, 70 Conduit Street, London, England W1S 2GF, England, United Kingdom

Mastercard UK Management Services Ltd, UK	4617367	10 Upper Bank Street, London, E14 5NP, United Kingdom
Vocalink Holdings Limited	06119036	Drake House, Homestead Road, Rickmansworth, Hertfordshire, WD3 1FX, United Kingdom
Vocalink Limited	06119048	1 Angel Lane, London, EC4R 3AB, United Kingdom
Vocalink International Limited	11646063	Drake House, Homestead Road, Rickmansworth, Hertfordshire, WD3 1FX, United Kingdom
Voca Ltd	01023742	71-75 Shelton St, Convent Garden, London, United Kingdom WC2H9JQ, United Kingdom
Voca Pension Trustees Ltd	09655475	Drake House, Three Rivers Court, Homestead Road, Rickmansworth, Hertfordshire, WD3 1FX, United Kingdom
Vocalink Interchange Network Ltd	03565766	1, Angel Lane, 9th Floor, LONDON, United Kingdom EC4R 3AB, United Kingdom
Vocalink Retail Services Ltd	02094831	Drake House, Homestead Road, Rickmansworth, Hertfordshire, WD3 1FX, United Kingdom
Mastercard OB Services UK Limited	12507991	1 Angel Lane, London, England, EC4R 3AB
Mastercard Transaction Services (UK) Ltd.	07031967	1 Angel Lane, London, England, EC4R 3AB
CATSEC 401 Ltd	02999731	Drake House, Three Rivers Court, Rickmansworth, Hertfordshire, WD3 1FX, United Kingdom
CEL Int, Ltd UK	06678417	Studio 116, Grand Union Studios, 332 Ladbroke Grove, London, United Kingdom
Ethoca Limited United Kingdom Branch	N/a	39 Houndsditch 2nd Floor London EC3A 7DB, United Kingdom
Global Mastercard Holdings LP	LP16352	10 Upper Bank Street, London, E14 5NP, England
IPco 2012 Ltd	08330583	1, Angel Lane, London, EC4R 3AB, United Kingdom
Mastercard Europe Services Limited	09210818	10 Upper Bank Street, Canary Wharf, London, E14 5NP, England
Mastercard Holdings LP	LP16341	10 Upper Bank Street, Canary Wharf, London England
Mastercard UK Holdco Limited	10255459	1 Angel Lane, London, EC4R 3AB, United Kingdom

	Mastercard UK Inc Pension Trustees Limited	4829819	10 Upper Bank Street, Canary Wharf, London, E14 5NP, United Kingdom
	Mastercard/Europay U.K. Limited	2398979	10 Upper Bank Street, Canary Wharf, London, E14 5NP, United Kingdom
	SessionM UK, Ltd.	10104186	10 Upper Bank Street, Canary Wharf, London, E14 5NP, United Kingdom
	Traina Interactive LTD	11033652	11th Floor, Whitefriars Lewins Mead, Bristol, BS1 2NT, United Kingdom
<b>FOR NORTH AMERICA:</b>			
<b>Country</b>	<b>Mastercard UK BCRs Entity</b>	<b>Registration number</b>	<b>Contact Details</b>
Canada	Mastercard Technologies Canada ULC	1146475	475 Howe Street, Vancouver, British Columbia V6C 2B3, Canada
	Ethoca LLC	4723423	4211 Yonge Street, Suite 202, Toronto, Ontario M2P 2A9, Canada
	Ethoca Technologies Inc.	2087762	100 Sheppard Ave. East, Suite 605, Toronto, ON M2N 6N5, Canada
	Mastercard Canada ULC	823401195BC0001	1600-925 West Georgia Street, Vancouver, British Columbia V6C 3L2, Canada
	MC MAPLE ACQUISITION ULC	BC1199328	PO Box 49290, 1000-595 Burrard Street, Vancouver, British Columbia V7X IS8,
	Trans-Fast Canada Inc.	652549	c/o Stewart McKelvey, 44 Chipman Hill, Suite 1000, P.O. Box 7289, Stn. "A",
	Transfast Inc.	1688924	Suite 419, 3390 Keele Street, Toronto, Ontario M3J1L6, Canada
	Trans-Fast Remittance LLC (Canada, British Columbia)	LLC0000280	44 Wall Street, New York, NY 10005, USA
United States	Mastercard International Incorporated	648928	2000 Purchase Street Purchase, NY 10577 U.S.A.
	Mastercard Technologies, LLC	3457984	2200 MasterCard Boulevard 63368-7263 O'Fallon, Mo U.S.A.
	Mastercard International Services, Inc.	3454605	2000 Purchase Street, Purchase New York 10577
	Maestro International Incorporated	2364231	2000 Purchase Street, Purchase, New York 10577, United States
	Mastercard Advisors, LLC	3736123	100 Manhattanville Road, Purchase, New York 10577

Mastercard Advisors, LLC Europe	4332162	100 Manhattanville Road, Purchase New York 10577- 2509 United States
Mastercard Advisors, LLC APMEA	4332163	100 Manhattanville Road, Purchase, New York 10577- 2509, United States
Orbiscom Inc.	3162153	2000 Purchase Street, Purchase, Harrison, NY 10577-2509 United States
Mastercard Mobile Transactions Solution, Inc.	59760807	2000 Purchase Street, Purchase New York 10577
Mastercard Travelers Cheque, Inc.	2197420	2000 Purchase Street, Purchase New York 10577
Applied Predictive Technologies (APT), Inc.	3146225	4250 N Fairfax Drive; 11th Floor; Arlington, Virginia 22203, United States
APT Software Holdings, Inc.	4202357	4250 North Fairfax Drive, 11 <sup>th</sup> Floor, Arlington, Virginia, 22203, U.S.A.
Brighterion, Inc.	3176106	150 Spear Street, 10th Floor, San Francisco, California 94105
Ekata Inc.	3999312	1301 5th Avenue, #1600, Seattle, Washington 98101, United States
ElectraCard Services, Inc.	0101013516	116 Village Boulevard, Suite 208, Princeton, New Jersey, 08540, United States
Eurocard U.S.A., Inc.	0100052091	2000 Purchase Street, Delaware 19901, United States
Finicity Corporation	4188418	434 West Ascension Way, Suite 200, Salt Lake City, Utah 84123, United States
Humanity Ventures LLC	6609893	2000 Purchase Street, Purchase, New York 10577, United States
IfOnly MX Holding LLC	6567043	2000 Purchase Street, Delaware 19901, United States
Mastercard A&M Investment Holdings, LLC	5446149	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard Africa, Inc.	3229450	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard Center for Inclusive Growth, Inc.	5483520	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard Colombia Holdings, LLC	5480411	2000 Purchase Street, Purchase, New York 10577, United States

Mastercard Colombia Investments, LLC	5480412	2000 Purchase Street, Purchase, New York 10577-2509, United States
Mastercard Colombia Processing, LLC	5480414	2000 Purchase Street, Purchase, New York 10577-2509, United States
Mastercard Colombia Technologies, LLC	5480415	2000 Purchase Street, Purchase, New York 10577-2509, United States
Mastercard Colombia, Inc.	2477931	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard Ecuador, Inc.	4565125	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard EMEA, Inc.	2503294	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard Financing Solutions LLC	3692050	2000 Purchase Street, Purchase, New York, 10577, United States
Mastercard Incorporated	3390142	2000 Purchase Street, County: Westchester, Purchase, New York 10577-2509, United States
Mastercard International Philippines, Inc.	2753003	1209 Orange Street, Wilmington, DE 19801
Mastercard Investment Holdings, Inc.	5005370	2000 Purchase Street, Purchase, New York 10577-2509, United States
Mastercard Latin America Holdings, Inc.	4888456	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard Mercosur, Inc.	2633468	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard Middle East, Inc	3546843	2000 Purchase Street, Purchase, New York 10577, United States
Mastercard Partners LLC	5635607	2000 Purchase Street, Legal Department, Purchase, New York 10577-2509, United States
Mastercard Peru, Inc	3157575	2000 Purchase Street, Purchase, New York 10577-2509, United States
Mastercard Prepaid Management Services USA, Inc.	4933598	2000 Purchase Street, Purchase, New York 10577-2509, United States
Mastercard Puerto Rico, LLC	192-LLC	250 Avenida de la Constitucion, San Juan, Puerto Rico, United States
Mastercard UK, Inc.	3245417	2000 Purchase Street, Purchase, New York 10577-2509, United States

	Mastercard US Holdings LLC	5619847	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Mastercard Venezuela, Inc.	2451848	2000 Purchase Street, Purchase, New York 10577-2509, United States
	MTS Holdings, Inc.	2468513	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Purchase Street Holdings, LLC	6985806	2000 Purchase Street, Purchase, New York 10577, United States
	Purchase Street Insurance Services, LLC	4889544	2000 Purchase Street, Purchase, New York 10577-2509, United States
	Purchase Street Reinsurance, Inc.	V750630	400 Cornerstone Drive, Sute 240, Chittenden County, Williston, Vermont 05495,
	RiskRecon, Inc.	5807551	5241 South State Street, Unit 3, Salt Lake City, UT 84107
	Session M, Inc.	4861126	2 Seaport Lane, 11 <sup>th</sup> Floor, Boston, MA 02210
	Session M Securities Corporation	001091193	2 Seaport Lane, Boston, Massachusetts 02210, United States
	Mastercard Transaction Services Corp.	7319857	Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware 19801,
	Traina Interactive Corp.	5043837	1209 Orange Street, Wilmington, Delaware 19801, United States
	Transactis, Inc.	3448387	1250 Broadway, New York, NY 10001p
	Trans-Fast Remittance, Holding LLC	5428620	44 Wall Street, Suite 400, New York, NY 10005
	Mastercard Transaction Services (US) LLC	4238893	Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware, 19801,
	Mastercard Transaction Services (California) Inc.	C3655952	44 Wall Street, Suite 400, New York, New York, 10005, United States
	Mastercard Transaction Services	E0401882016-1	701 S. Carson St., Suite 200, Carson City, Nevada 89701, United States
<b>FOR ASIA PACIFIC:</b>			
<b>Country</b>	<b>Mastercard UK BCRs Entity</b>	<b>Registration number</b>	<b>Contact Details</b>
Australia	Mastercard Loyalty Solutions Australia Pty Ltd	002693656	72 Christie Street, St Leonards NSW 2065, Australia

	APT Australia Pty. Ltd.	603177171	72 Christie Street, St Leonards, NSW 2065, Australia
	Burst Acquisition Co. Pty. Ltd.	ACN 644 142 834	72 Christie Street, St Leonards, NSW 2065, Australia
	Ethoca Australia Branch	ABN: 891 864 66976	100 Harbour Esplanade Docklands, Victoria 3008, Australia
	IfOnly Australia Pty Ltd.	629 248 399	Level 10, 68 Pitt Street, Sydney NSW 2000, Australia
	Mastercard Asia/Pacific (Australia) Pty Ltd	108 603 345	72 Christie Street, St Leonards, NSW 2065, Australia
	Mastercard Australia Holding Pty Ltd	143 337 722	72 Christie Street, St Leonards, NSW 2065, Australia
	Mastercard Australia Pty Ltd	168 732 429	72 Christie Street, St Leonards, NSW 2065, Australia
	Mastercard Prepaid Management Services Australia Pty Ltd	145 452 044	72 Christie Street, St. Leonards, NSW 2065, Australia
	Mastercard Travel Solutions Australia Pty Ltd	003 745 999	72 Christie Street, St Leonards, NSW 2065, Australia
	Plus Points Pty Ltd	101 890 537	72 Christie Street, St Leonards, NSW 2065, Australia
	PPS Loyalty Pty Ltd	129 013 921	72 Christie Street, St Leonards, NSW 2065, Australia
	Trans-Fast Pty, Ltd	95149710494	53B Sunnybank Hills Shopping Town, Sunnybank Hills, Australia QLD 4109, Australia
Bangladesh	Bangladesh Rep Office of Trans-Fast Remittance, LLC	03.219.344.00.00 .0000.2530.0209 2019	City Centre, Level-27, Suite # 26 A1-A2, 90/1, Motijheel, C/A, GPO, Dhaka, PO: 1000
	Bangladesh Representative Office of Mastercard Singapore Holding Pte. Ltd.	03.219.344.00.00 .0000.2478.2407 2019	Crystal Place (12th Floor), SE (D) 22, Road #140, Gulshan South Avenue, Gulshan-1, Dhaka, 1212, Bangladesh
Cambodia	Cambodia Representative Office of Mastercard Singapore Holding Pte. Ltd.	1784/2015	Canadia 18th Floors, No. 315., Aung DOUNG Street Corner Monivong Blvd, Sangkat Wat Phnom, Khan Daun Penh, Phnom Penh, Cambodia
China	APT Technology Consulting (Shanghai) Co., Ltd.	91310115MA1K 3LDL5Q	Unit 1904, No. 8 Central Avenue, Pilot Free Trade Zone, Shanghai, China



	Beijing Branch of Mastercard Information Technology (Shanghai) Co., Ltd	110000450260468	B1207, NO.26, Chaowai Street, Chaoyang District, Beijing, China
	China Branch (Beijing) of Mastercard Shanghai Business Consulting Co., Ltd.	911101015694944632	Room 501A, 5th Floor, China Resources Building, No. 8 Jianguomenbei Avenue, Dongcheng District, Beijing 10005, China
	China Branch (Guangzhou) of Mastercard Shanghai Business Consulting Co. Ltd.	91440101569751351Q	Room 2015-16A, CITIC Plaza, No. 233 Tianhe North Road, Guangzhou, 510613, China
	China Representative Office (Beijing) of Mastercard International Incorporated	91110000X000004579	No. 8 Janguomen Wei Ave., China Resources Building, Room 701-702, Beijing, 100005, China
	China Representative Office (Guangzhou) of Mastercard International Incorporated	91440101781210958N	Room 2015-16A, CITIC Plaza, No. 233 Tian He North Road, Guangzhou, Guangzhou 510613, China
	Mastercard Information Technology (Shanghai) Co., Ltd.	[2010]0192	Suite 739, No 718, Guangming Road, Pudong New District, Shanghai, China
	Mastercard Netsunion Information Technology (Beijing) Co, Ltd.	91110102MA01HHL193	Room 111, No. 101 Building 3, Beishanhuan Middle Road No. 29, Xicheng District, Beijing, China
	Mastercard Shanghai Business Consulting Ltd.	9131000067116572XD	Room 2907-14, 29/F, Shanghai IFC, 8 Century Avenue, Pudong, Shanghai, 200120, China
	Pinpoint Market Information Consulting (Shanghai) Co Ltd	[2007]0448	Room 1206-B12, NO. 333, Middle Huaihai Road, Huangpu District, Shanghai, China
	Pudong Branch of Mastercard Information Technology (Shanghai) Co.,	310115500130618	Room 04, 40/F, One Lujiazui   No.68, Middle Yincheng Road, Shanghai, China
Hong Kong	Mastercard Asia/Pacific (Hong Kong) Limited	893425	Suite 1801-03, 18/F Central Plaza, 18 Harbour Road, Wanchai, Hong Kong
	Mastercard Loyalty Solutions China Limited	1337732	Unit 1001, 10/F., Infinitus Plaza, 199 Voeux Road, Central, Hong Kong
	Mastercard Loyalty Solutions Hong Kong Limited	753228	Unit 1001, 10/F., Infinitus Plaza, 199 Voeux Road, Central, Hong Kong
	Mastercard Loyalty Solutions International Limited	708782	Unit 1001, 10/F., Infinitus Plaza, 199 Voeux Road, Central, Hong Kong
	Mastercard Travel Solutions Hong Kong Limited	1571209	Room No. 3512, 35/F, Central Plaza, 18 Harbour Road, Wanchai, Hong Kong

	New York Bay (Hong Kong) Ltd	2213306	Units 1607-8, 16th Floor, Citicorp Centre, 18 Whitfield Road, Causeway Bay, Hong Kong
India	Mastercard India Services Private Limited	U93000HR201 2FTC047951	4 <sup>th</sup> Floor, DLF Plaza Tower, DLF Phase 1, Gurgaon – 122 002, India
	Mastercard Technology Private Limited, India	U72200PN2000P TC014585	Business Bay, 10th Floor, Tower A, Wing 1 Survey No. 103, Opp. Poona Club Golf Course Airport Road, Yerwada, Pune – 411 006, India
	Mastercard Mobile Transactions Solutions Private Limited	U72200PN2005 PTC165613	Business Bay, 4th Floor, Tower A, Wing 1 Survey No. 103, Opp. Poona Club Golf Course Airport Road, Yerwada, Pune – 411 006, India
	Mastercard Loyalty Solutions India Private Limited	U74900MH209P TC190903	602-603, Windfall, Sahar Plaza, J B Nagar, Andheri-Kurla Road Mumbai, Maharashtra, 400 059 India
	India Branch (Gurgaon) of MasterCard Advisors, LLC APMEA	83.050.2012.13	5th Floor, DLF Plaza Tower, DLF Phase 1, Gurgaon, Haryana 122002 (PIN, India)
	India Rep Office of Mastercard International Incorporated	NDL092000069	61-A, 2 North Ave, 4th Fl, Maker Maxity, Bandra, Kurla Complex, Mumbai, Mumbai 400051, India
	Finicity Technologies Private Limited	U72200MH200 5PTC154044	Unit No.601-602, Building No.3, Gigaplex Estate Private Limited, Plot No.IT-5, Airoli Knowledge Park, Navi Mumbai Thane, Navi Mumbai Thane, Maharashtra 400708, India
	Mastercard Switching Services India Private Limited	U74999PN2021 FTC203994	Fourth Floor, Wing-1, Business Bay, Survey No. 103, Hissa No. 2 Airport Road, Yerwada, Pune, Maharashtra 411006, India
	Mastercard Money Transfer Services India Private Limited	U67190PB1995 PTC015897	Lower Ground Floor, Office No. 6, City Square EH-197, Civil Lines, Jalandhar PB, India 144001, India
	Mastercard XBS Technologies Private Limited	U67190MH201 0FTC206754	C-201, Kailas Esplanade, LBD Marg, Ghatkopar West, Mumbai, Maharashtra 400086, India
Indonesia	PT Mastercard Indonesia	09.05.1.70.6800 08	Sentral Senayan 1, Lt. 17/117 E, JL., Asia Afrika No. 8, Central Jakarta, Indonesia

Japan	APT Japan G.K.	0104-03-01088	CERULEAN TOWER 16F 26-1 Sakuragaoka-cho Shibuya-ku, Tokyo 150-0031 Japan
	Japan Branch of Mastercard Loyalty Solutions International Limited	708782	Cerulean Tower, 16th floor, 26-1, Sakuragaoka-cho, Shibuya-ku, Tokyo, Japan
	Mastercard Japan K.K.	0110-01-051453	Cerulean Tower 16F, 26-1 Sakuragaoka-cho, Shibuya-ku, Tokyo, Japan 150-8512, Japan
	Mastercard Prepaid Management Services Japan KK	0110-01-069577	Cerulean Tower, 16th Floor, 26-1 sakuragaoka-cho, shibuya-ku, Tokyo 100-8133, Japan
	Mastercard Services Japan Limited	0110-03-006898	Cerulean Tower 16th Floor, 26-1, Sakuragaoka-cho, Shibuya-ku, Tokyo150-8512, Japan
	Trans-Fast Japan Company Limited	0111-01-074059	Shinjuku Ku, Tokyo, Japan
Malaysia	Malaysia Branch of Mastercard Asia/Pacific Pte. Ltd.	200402000010	43-2, Plaza Damansara, Jalan Medan Setia 1., Bukit Damansara, Kuala Lumpur, Malaysia 50490, Malaysia
	Trans-Fast Payment Solutions SDN BHD	1220440-D	Level 1, No.11, Jalan PJU 1A/41B, NZX Commercial centre, Ara Jaya, Selangor, Petaling Jaya Malaysia
Nepal	Nepal Rep office of Trans-Fast Remittance, LLC	159346	KMNP-01, Bagmati, Kathmandu
New Zealand	Mastercard Loyalty Solutions New Zealand Limited	229 8309	Martelli McKegg, Level 20, Pwc Tower, 188 Quay Street,Auckland, New Zealand 1010, New Zealand
	Mastercard New Zealand Limited	1893982	C/- Martelli McKegg, Level 20, PwC Tower, 188 Quay Street,Auckland, New Zealand 1141, New Zealand
	Mastercard Prepaid Management Services (NZ) Limited	3261147	Level 3, MasterCard House, 136 Customs Street,West Auckland, New Zealand 1010, New Zealand
Philippines	New York Bay Philippines, Inc.	182094	Unit 2-7 Level 18 IBP Tower, Dona Julia Vargas Avenue, Ortigas Center, Pasig City, Philippines
	Philippines Branch of Mastercard International Philippines, Inc.	A199915970	27/F Unit D, Tower One and Exchange Plaza, Ayala Triangle, Ayala Avenue, Makati City, Manila,

	Philippines Branch of Mastercard Singapore Holding Pte. Ltd.	FS201222408	Units 903 & 904 - 9th Floor, Tower One, Ayala Triange, Ayala Avenue, Makati City, Philippines
Singapore	Mastercard Asia/Pacific Pte. Ltd, Singapore	199306324E	3 Fraser Street DUO Tower, Level 17, Singapore 189352
	Access Prepaid Singapore Pte. Ltd.	201105746G	10 Changi Business Park, Central 2; #05-01, HansaPoint@CBP, 486030, Singapore
	Mastercard AP Financing Pte. Ltd.	201731499K	3 Fraser Street, #17-21/28, Duo Tower, 189352, Singapore
	Mastercard Labs Kenya Holdings Pte. Ltd.	201431144W	3 Fraser Street, DUO Tower 17-21/28,189352, Singapore
	Mastercard Loyalty Solutions Singapore Pte. Ltd.	199302957W	10 Changi Business Park Central 2, #05-01, Hansapoint@CBP, 486030, Singapore
	Mastercard Singapore Holding Pte. Ltd.	201008183D	152 Beach Road #35-00, The Gateway East,189721, Singapore
	Mastercard Travel Solutions Singapore Pte. Ltd.	201309334G	10 Changi Business Park Central 2, #05-01,Singapore, Singapore 486030, Singapore
	Mastercard VocaLink Asia Pacific Pte. Ltd.	201927008N	3 Fraser street, #17-21/28, Duo Tower, Singapore
	Mastercard Transaction Services (Singapore) Pte. Ltd.	201700267K	491B River Valley Road, #15-01, Valley Point,248373, Singapore
	Ekata Global - Singapore Pte. Ltd	201942960H	79 Robinson Road #06-22 Singapore 068897
South Korea	Access Prepaid Korea Limited	110114-0098621	16th floor, 136, Sejongdaero, Jung-gu, (Seoul Finance Center, Taepyeongro-1ga), Seoul, Republic of Korea
	Mastercard International Korea Ltd.	113023	16F, Seoul Finance Center, 136 Sejongdaero Junggu, Seoul, 100-768, Republic of Korea
Sri Lanka	Sri Lanka Rep Office of Mastercard Singapore Holding Pte. Ltd.	1263	Regus 26, East Tower, World Trade Centre, Echelon Square, Colombo, Sri Lanka
	Transfast (Private) Limited	248190	Bernards Business Park, 2nd Floor, 106 Dutugemunu Street, Kohuwala, Dehiwala, Sri Lanka
Taiwan	Taiwan Branch of Applied Predictive Technologies, Inc.	2899-4556	42F., NO.68, SEC. 5, ZHONGXIAO E. RD., XINYI DIST., TAIPEI CITY,11065, Taiwan

	Taiwan Branch of Mastercard Singapore Holding Pte. Ltd.	28987963	Room B and Room A1, 42 F, No. 68, Sec. 5, Zhongxiao E. Rd., Xinyi Dist.,Taiwan 110, Taiwan
	Trans Fast Remittance LLC (Taiwan Rep Office) (Liaison Office)	3438847	6F, No. 378, Changchun Rd., Zhongshan Dist.,Taipei City, Taiwan
Thailand	Mastercard (Thailand) Limited	105 558 076 584	1 Q House Lumpini Building, 16th Floor, Unit 1601, South Sathorn Road, Khwaeng Thungmahamek, Khet Sathorn, Bangkok, Thailand
	Thailand Branch of Mastercard Asia/Pacific Pte. Ltd.	100 538 031 378	Q House Lumpini Building Unit 1601, 16th Fl, 1 South Sathorn Road, Kwaeng Thungmahamek, Khet Sathorn, Bangkok, 10120, Thailand
Vietnam	Vietnam Representative Office of Mastercard Asia/Pacific Pte.Ltd.	1993306324E	Ho Chi Minh City, Viet Nam, Viet Nam
<b>FOR MIDDLE EAST &amp; AFRICA:</b>			
<b>Country</b>	<b>Mastercard UK BCRs Entity</b>	<b>Registration Number</b>	<b>Contact Details</b>
Bahrain	Bahrain Representative Office of Mastercard Singapore Holding Pte. Ltd	103106-1	Block 316, Road 365, Building 0001, Flat/Shop 904, Manama Center, Bahrain
Ivory Coast	Ivory Coast Representative Office of Mastercard Singapore Holding Pte Ltd	CI-ABJ-2017-B-6983	c/o Regus Abidjan, XL Plateau Centre, 6 floor, Unit 602, Corner of Dr. Crozet St., and Boulevard de la Republique, Plateau 01 BP 2785, Abidjan, Cote D'Ivoire
Egypt	Egypt Representative Office of Mastercard Middle East, Inc.	1016	13 Al Themar St., 10th Floor, Mohadessin,Cairo, Egypt
	Mastercard Egypt LLC	1976	Nile City Towers, North Tower, 16th Floor, 2005C Corniche El Nil, Cairo, Egypt
Ghana	Mastercard Ghana Limited	CS155212020	5TH FLOOR VIVO PLACE, CANTONMENTS, Rangoon St; P. O. BOX MB 595,Accra, Ghana
Jordan	Mastercard Asia/Pacific Pte. Limited/Jordan	44389	Business Park Development Zone/Amman, 26 Temp, 2 Alkursi, Gh 02, Third Floor - Office No. 3, Amman, Jordan

Kenya	Mastercard East Africa Limited	CPR/2011/55650	LR No. 1870/V/72, Sanlam Towers, 4th Floor, Waiyaki way, P.O. Box 2194-00606, Nairobi, Kenya
	Mastercard Labs Kenya Limited	CPR/2015/174295	L.R. No 209/8257, 6th Floor, ABC Towers, ABC Place, Waiyaki Way, PO Box 40034-00100, Kenya
Morocco	Morocco Branch of Mastercard Africa, Inc.	1811	Tour Crystal 1, 12th Floor, Boulevard Sidi Mohammed Ben Abdellah, Quartier Casablanca Marina, Casablanca, 20030, Morocco
Myanmar	Mastercard Myanmar Limited	127160295	221 Sule Pagoda Road, Level 18, Unit 18-03, Sule Sq, Kyauktada Township, Yangon, 11181, Myanmar
Nigeria	Mastercard Services Sub-Saharan Africa Limited	RC 1384603	7st Floor, Alliance Place, 33A Alfred Rewane Road, Ikoyi, Lagos, Nigeria
	Mastercard West Africa Limited	RC 889080	7th floor, Alliance place, 33A, Alfred Rewane road, Ikoyi, Lagos, Nigeria
	NYBER Nigeria Limited	1055739	Flat 3, block 34 Maryland Housing Estate, Maryland, Lagos State, Nigeria
	Trans-Fast Remittances Ltd.	1382856	Block 34, Maryland Housing Estate, Maryland Ikeja, Lagos Nigeria
Pakistan	Mastercard Pakistan (Private) Limited	0098089	Care of M/s SurrIDGE & Beecheno, 3rd Floor, Finlay House, I.I. Chundrigar Road, Karachi, Pakistan
	Pakistan Rep office of Trans-Fast Remittance, LLC	13282856	Office No. 202, Plot No.19-A/6, Business Centre, P.E.C.H.S, Main Shahrah-e-Faisal, Karachi East Jamshed Town, Pakistan
Qatar	Mastercard Gulf LLC	QFC No. 00160	Al Fardan Office Tower, Office No. 2, 16th Floor, AlFardan Office Towers, West Bay, P.O. Box 21491, Doha, Qatar
Saudi Arabia	Saudi Arabia Branch of Mastercard Middle East, Inc.	1010192854	King Fahad Road, Al-Olaya Dist. Hamad Tower, Unit 301, P.O. Box 66749, Riyadh, 12212, Saudi Arabia
	Trans-Fast Remittance LLC (Saudi Arabia) (Branch)	10210390379846	Al-Faisaliah Tower, King Fahd Road, 11596, Riyadh, P.O. 67147, Saudi Arabia

Senegal	Mastercard Dakar Bureau de Representation	201008183D	SIA Building, 1st Floor, Route de Ngor, Les Almadies, Dakar Senegal
	Trans-Fast SAU	SN-DKR-2009-B-20224	Lot 30-C1, Sotrac Mermoz, Dakar, Senegal
South Africa	Mastercard Payment Gateway Services PTY Limited, South Africa	2004/018042/07	2nd Floor, 23 Melrose Boulevard, Merlose Arch, Melrose North, Gauteng, 2196, South Africa
	5one Marketing SA Pty Ltd, South Africa	20007/035413/07	Regent Square, Cnr Doncaster Road & Rosmead Avenue, Kenilworth, 7708, South Africa
	Mastercard Southern Africa (Pty) Ltd	2011/006482/07	2nd Floor, 23 Melrose Arch Boulevard, Melrose Arch, JOHANNESBURG, 2196 South Africa
	South Africa Branch of Mastercard Prepaid Management Services	2011/011898/10	7 West Street, Houghton, South Africa 2041, South Africa
	Trans-Fast South Africa, Pty Ltd.	K2017147418/07	Postnet Suite 148, Private Bag X32, Highveld Park Centurion, Gauteng, 0157, South Africa
United Arab Emirates	Mastercard Middle East Africa FZ-LLC	20564	204-214, 2nd Floor, Building 04, Dubai, Dubai, United Arab Emirates
	Mastercard Transaction Services FZ-LLC	20624	2303, Aurora Tower, Next to Media One Hotel, Dubai Media City, Dubai, United Arab Emirates
	Trans-Fast Remittance, LLC (UAE)	11179	Leased Office Bldg Office No. 22G21, 22, 24, Hamriyah Free Zone – Sharjah, United Arab Emirates
Zimbabwe	Mastercard Zimbabwe (Private) Limited	13377/2019	24 Lanark Road, Belgravia/Avondale, Harare, Zimbabwe

**FOR LATIN AMERICA**

Country	Mastercard UK BCRs Entity	Registration Number	Contact Details
Argentina	Argentina Branch of Mastercard Mercosur, Inc	30-689904390	Olga Cossettini, #771 2nd Floor, Buenos Aires, Argentina C1107CDA, Argentina
	Mastercard Cono Sur S.R.L.	1776014	Edificio Porteno 1, Olga Cossentini 771 2nd Floor, Buenos Aires, Argentina C1107CDA, Argentina
	Latarg Holding S.R.L.	30717183467	Maipú 1300, 11th Floor, Buenos Aires, Argentina



Brazil	Access Prepaid Brasil Servicos de Cartoes S.A.	35.300.389.859	Bernadino de Campos 318, 6° andar, Brooklin, Sao Paulo, Brazil CEP 04621-0, Brazil
	Brasil Branch of Mastercard Brasil Solucoes de Pagamento Ltda.	05.577.343/000 2-18	SH/SUL Quadra 06, Conjunto A, Bloco 6, Sala 611, Centro Empresarial Brasil 21, Brasilia, Brazil 70.316-000, Brazil
	Mastercard Brasil Ltda.	CNPJ/MF 01.248.201/000 1/75	Centro Empresarial Nacoes Unidas, Av. Das Nacoes Unidas 14.171, 20th Andar, Torre C - Crystal Tower 0479-000, Brazil
	Mastercard Brasil Participacoes Ltda.	23.529.362/000 1-70	Avenida das Nações Unidas, 14.171, Crystal Tower, 19° andar, São Paulo 04794-000, Brazil
	Mastercard Brasil Soluções de Pagamento Ltda.	05.577.343/000 2-18	Condomínio Rochaverá, Av. Das Nacoes Unidas 14.171. 20th Andar, Torre C - Crystal Tower, Sao Paulo, 04794-000, Brazil
	Zargoje Participações Ltda.	21.793.694/000 1-31	Nações Unidas Av., 14.171, 20o floor, Crystal Tower, São Paulo/SP, 04794-000, Brazil
Chile	Chile Representative Office of Mastercard International Incorporated	3998/93	Apoquindo 2929, Piso 21, Las Condes, Santiago, Chile
	Mastercard International Incorporated Chile Limitada	17658	Apoquindo 2929, Piso 21, Las Condes, Santiago, Chile
Colombia	Colombia Branch of Mastercard Colombia, Inc.	640275	Santa Fe, Bogota, Colombia
	Mastercard Colombia Administradora S.A.	02735104	Carrera 11 No. 84-09 Entrada Norte, Piso 8 Oficina 801, Bogota, Colombia
Costa Rica	Mastercard Costa Rica Billing Services S.R.L.	3-102-689914	Sexto Piso De Torre Lexus, Oficina Numero Ae, Sobre La Calle Marginal, De La Ruta Nacional Numero Veintisiete, San Jose-Escazu San Rafael, Costa Rica
	Mastercard Costa Rica, S.R.L	3-102-607815	Torre Lexus, Piso 6, Avenida Escazú, San Rafael de Escazú, San Jose, Costa Rica
Dominican Republic	Mastercard Republica Dominicana, SRL	1-31-36908-1	Rafael Augusto Sanchez No. 86, Torre Empresarial: Roble corporate center, Piso 7, Piantini, Santo Domingo, Dominican Republic
Ecuador	Ecuador Branch of Mastercard Ecuador, Inc.	1792163846001	Av. 6 de Diciembre y Luis Cordero, Edif. Novus, Ofic. 401, Quito Ecuador

Guatemala	Mastercard Guatemala Servicios Limitada	129858, Folio 569, Libro 223	Tercera Avenida 13-78 Zona 10, Octavo Nivel Citibank Tower, Guatemala
Jamaica	Jamaica Branch Office of Mastercard Latin America Holdings, Inc.	1943 (Overseas)	Panjam building, Ninth floor, 60 Knutsford boulevard, Kingston 5, Kingston, Jamaica
Mexico	IfOnly Mexico S.A.P. I de CV	551276-1	Av. Paseo de la Reforma No. 250, Torre A Piso 22, Col. Juárez, Del Cuauhtémoc, 06600, CDMX, Mexico
	Mastercard Mexico Billing Services, S. de R.L. de C.V.	492297	Av. Paseo de la Reforma No. 250, Torre A Piso 22, Col. Juárez, Del Cuauhtémoc, 06600, Mexico
	Mastercard Mexico, S. de R.L. de C. V.	332409-BIS	Av. Paseo de la Reforma No. 250, Torre A Piso 22, Col. Juárez, Del Cuauhtémoc, 06600, Mexico
	Mexico Representative Office of Mastercard International Incorporated	N/a	Av. Paseo de la Reforma No. 250, Torre A Piso 22, Col. Juárez, Del Cuauhtémoc, 06600, Mexico
	TF Mexico Soluciones S. de R.L. of C.V.	Money Trasmitter License: 22189	Av. Las Americas 187, 1 Las Americas Morelia, Morelia Michoacan, CP 58270, Mexico
	TF Remittance SA de C.V.	17563	Av. Las Americas 187, 1 Las Americas Morelia, Morelia Michoacan, CP 58270, Mexico
Panama	Mastercard Panama S. de R.L.	929481	SUCRE & ARIAS & REYES, 48th Street East Bella Vista, Sucre Building, Panama City, Panama
Peru	Peru Branch of Mastercard Peru, Inc.	11175092	Avenida El Derby 055, Torre 1, 5th Floor, Oficina 501, Edificio Cronos, Santiago de Surco, Lima, 27, Peru
Trinidad And Tobago	Trinidad and Tobago branch of Mastercard Latin America Holdings, Inc.	E20210120038 21	Nos. 129-131 Abercromby Street, Port-of-Spain, Trinidad and Tobago
Uruguay	Mastercard Uruguay Limitada	22353	Mantua # 6706, Office 005, Montevideo, Uruguay
Venezuela	Venezuela Branch of Mastercard Spain Holdings, S.L.	221-38685	Banco Occidental de Descuento, Piso 2, Oficinas 2 C and 2D, Urbanizacion El Rosal, Avenida, Venezuela
	Venezuela Branch of Mastercard Venezuela, Inc.	16, vol. 57-A-4th	Torre Banco Occidental de Descuento,, Piso 2, Oficina 2-CD,, Urb. El Rosal, Caracas, 1060, Venezuela

The Privacy & Data Protection Team will assess on a case-by-case basis the data transfer practices of any newly acquired companies that have not yet signed Mastercard's Intra-group Agreement and implement appropriate interim data transfer solutions, including contractual guarantees.

## Appendix 2 Glossary

**Account Servicing Payment Services Provider ('ASPSP')** – means the entity that provides a payment account for the PSU and which permit payments initiated by TPPs and/or make the PSU's account transaction data available to TPPs.

**Applicable Law** – means any laws, ordinances, constitutions, regulations, statutes, treaties, rules, principles of common law or other statutory requirements applicable to Mastercard UK BCR Entities.

**Data Controller** – means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the Processing of Personal Information.

**Data Processor** – means the natural or legal person, public authority, agency or any other body which processes Personal Information on behalf of and under the instructions of the Data Controller.

**Data Protection Authority or DPA** – means the independent public authority supervising compliance with privacy and data protection legislation.

**Employee** – means past, present and prospective employees, consultants, temporary workers, independent contractors, directors or officers employed or hired by Mastercard.

**EEA** – means the European Economic Area, comprised of the EU Member States plus Iceland, Liechtenstein and Norway.

**Europe** – means the EU Member States, EEA countries, Switzerland and Monaco.

**GDPR** – means the EU General Data Protection Regulation 2016/679 (as amended and replaced from time to time).

**ICO** – means the Information Commissioner, which is the Data Protection Authority of the UK.

**Individual** – means an identified or identifiable natural or legal person (to the extent a legal person is subject to national data protection law) to whom the Personal Information pertains.

**UK BCRs Intra-group Agreement** – means the intra-group agreement that binds Mastercard UK BCR Entities to the UK BCRs.

**Mastercard** – means the Mastercard Group composed of Mastercard International Incorporated, Mastercard Europe SA, their subsidiaries and affiliates.

**Mastercard UK BCRs Entity(ies)** – means the Mastercard entities that are bound by the UK BCRs and have duly executed the Intra-group Agreement (listed in Appendix 1).

**Mastercard Rules** – the Rules for the Mastercard, Maestro and Cirrus brands, as available at [http://www.mastercard.com/us/merchant/pdf/BM-Entire\\_Manual\\_public.pdf](http://www.mastercard.com/us/merchant/pdf/BM-Entire_Manual_public.pdf).

**Mastercard Staff** – Employees, consultants, temporary workers, independent contractors, directors or officers employed or hired by Mastercard and who are bound by the UK BCRs.

**Personal Data Breach** – means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Information transmitted, stored or otherwise processed.

**Personal Information** – means any information relating to an identified or identifiable natural or legal person (to the extent a legal person is subject to national data protection law), an identifiable natural or legal person is one who can be identified, directly or indirectly, in particular by reference to an identification number (such as the personal account number) or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

**Processing** – means any operation or set of operations which is performed on Personal Information or on sets of Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Payment Services User ('PSU')** – means the legal or natural person making use of an Open Banking payment service as a payee, payer or both.

**Sensitive Data** – means any Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data or biometric data processed for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation, as well as any other type of data that will be considered to be sensitive according to any future revision of UK Data Protection Law.

**Sub-Processor** – means the entity engaged by the Data Processor or any further sub-contractor to process Personal Information on behalf of and under the instructions of the Data Controller.

**Third Party Provider ('TPP')** – means the legal or natural person that provides account initiation services or payment initiation services to a PSU.

**UK** – means the United Kingdom.

**UK Data Protection Law** – means: (1) the Data Protection Act 2018; (2) the GDPR as amended by the Data Protection Act 2018 and the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 and 2020 ('**UK GDPR**') as relevant; and (3) the e-Privacy Directive 2002/58/EC (as amended by Directive 2009/136/EC) as transposed into UK national law.